### REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IV

Page 1 of 1

EPA ID: GA0001897768 Site Name: PROPERTY OF GEORGIA HOUSING & FINANCE

Alias Site Names:

City: NEWNAN

County or Parish: COWETA

State: GA

Refer to Report Dated: 09/30/97

Report Type: PRELIMINARY ASSESSMENT 001

Report Developed by:

DECI	SION:			
X	1. Further Remedial Site Assessr because:	nent under CERCLA	(Superfund) is not require	d
	X 1a. Site does not qualify for fo (No Further Remedial Action F	urther remedial site a Planned - NFRAP)	ssessment under CERCL	A.
	1b. Site may qualify for action	, but is deferred to:		
	2. Further Assessment Needed U			
		ower		
	2b. Other: (recommended act	tion)		
DISCI	USSION/RATIONALE:			
A previo	ous home on this site location was treated with ten A new home has been placed on top of the previou	miticides on several locations. Is home location. The draft s	Chlordane was detected at 230 pp core is 19.	b. This home was demolished in April
				6
				*
			<u> </u>	

Site Decision Made by:

Date: 08/28/98

EPA Form # 9100-3

#### PRELIMINARY ASSESSMENT

Property of Georgia Housing & Finance Authority Newnan, Coweta County, Georgia

CERCLIS ID No.: GA0001897768

September 30, 1997

State of Georgia Department of Natural Resources **Environmental Protection Division** Hazardous Waste Management Branch

Prepared By:

James Sliwinski

**Environmental Engineer** 

Reviewed By:

Jim McNamara Acting Unit Coordinator Approved By:

Bill Mundy

Program Manager

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#### 1.0 INTRODUCTION

Under authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), the Georgia Environmental Protection Division, Hazardous Waste Management Branch conducted a Preliminary Assessment (PA) at the Property of Georgia Housing & Finance Authority site in Newnan, Coweta, Georgia. The purpose of this investigation was to collect information concerning conditions at the Property of Georgia Housing & Finance Authority site sufficient to assess the threat posed to human health and the environment and to determine the need for additional CERCLA/SARA or other action. The scope of the investigation included review of available file information, a comprehensive target survey, an off-site reconnaissance, and an on-site survey.

#### 2.0 SITE DESCRIPTION, OPERATION HISTORY, AND WASTE CHARACTERISTICS

#### 2.1 Location

Property of Georgia Housing & Finance Authority (GHFA) site is located in Newnan, Coweta, Georgia.

The site is located 0.75 mile north of the city of Newnan, Georgia. The geographic coordinates are 33°24'21" N latitude and 84°49'03" W longitude (Fig. 1, Ref. 1). To reach the site, travel south on Interstate 85 from Atlanta to Newnan. Go west on Highway 34 to reach the city of Newnan. Exit on U.S. Route 29 or Highway 14. Go north for 1/2 mile, then northwest on Highway 70 or Roscoe Road for 1 mile. Exit on Lake Shore Drive at the Pinecrest Subdivision. Go west for 2000 feet just past Young Avenue. The site is second property on the left side of the road, 20 Lake Shore Drive.

The climate in Coweta County is mild. Means temperature range from 44°F in January to 78°F in July (Ref. 2). The mean annual precipitation is approximately 48 inches, with a net of 7 inches (Ref. 7).

#### 2.2 Site Description

The 0.4-acre site is along the south side of Lake Shore Drive and is characterized by a 1,272 square-foot home with a gravel covered driveway. No fence secures the perimeter of the site. There is a down gradient slope along the western edge of the property. The area surrounding the site can best be described as residential with the nearest home being less than 100 feet from the site (Figs. 1 and 2).

#### 2.3 Operational History and Waste Characteristics

The property has had several different owners. The property was owned by William Harvey Hill in 1967 who built a 1,300 square-foot home. This house was demolished and another home was built in 1974. Mr. Curtis and Mrs. Shirley Young at burchased the property in July 1985. From March 1986 to 1988 the property was treated several times for termites using chlordane termiticide. An employee of the Ryder Pest Control Company made a pesticide application (chlordane) in a manner not suitable, and inconsistent with labeling restrictions, to a wooden deck at the rear of the house. The chlordane was tracked into the living areas of the house. Subsequent sampling of the interior of the house, including air samples from the living areas and basement and wipe samples of carpet and HVAC ducts indicated the presence of chlordane. Bulk samples of soil

from around the house foundation walls and from the area of the deck indicated the presence of chlordane. The deck was subsequently removed and replaced by the pest control operator in May 1988, and a portion of the soil beneath the deck was also removed. Confirmatory sampling of the soils during removal was not conducted. Subsequently, the Young's abandoned the property, and a foreclosure resulted. The Georgia Housing and Finance Authority (GHFA) acquired the property involuntarily (pursuant to its loan servicing agreement) subsequent to foreclosure. Testing of the site in 1991 provided information that a high level of termiticide remained in the foundation, soils and interior of the dwelling. In September 1995, Law Engineering and Environmental Services, Inc. (Law) collected six shallow soil samples at five locations in the area of the deck to further evaluate the actual soil concentrations. The analytical results indicated that the maximum concentration for chlordane and heptachlor were 230  $\mu$ g/kg and 7.1  $\mu$ g/kg, respectively. On July 3, 1996 the Georgia Environmental Protection Division (EPD) notified Joseph Luttrell at (404) 679-0654 of GHFA that, based upon available information, it has determined that the release of chlordane and heptachlor to the soils beneath the deck does not meet the criteria for notification; trigger levels of 9.2 mg/kg for chlordane and 0.66 mg/kg for heptachlor. In March and April 1996, the house itself was demolished and removed to an appropriate landfill. See attachment Appendix E. Danny R. Buck purchased the property from GHFA on October 22, 1996 and then transferred the property to Richard Homes, Inc. on November 21, 1996. In February 1997, a new 1,272 square-foot home was brought in and placed upon area where the contaminated the former house was located. Currently,(b)(6) Personal Privacy and their child reside in this house.

#### 3.0 GROUNDWATER PATHWAY

#### 3.1 Hydrogeologic Setting

The GHFA site is located in the Southern Piedmont belt of the Piedmont physiographic province within the south Metropolitan Atlanta region (Refs. 9, p. 3; 10, pp. 2-3). In this area, regional tectonic stresses have warped the Paleozoic rock units into a complex series of folds that have been broken by faults and intruded by younger igneous plutons and dikes (Ref. 9, p. 4). The Southern Piedmont belt is a major grouping of metamorphic rocks that trend northeast-southwest across a large portion of northern Georgia and is separated from the Northern belt located approximately 5 miles southwest of the Brevard fault zone (Ref. 10, p. 23). Underlying the GHFA site are surficial deposits of interlayered amphibolite, gneiss, and schist (Refs. 10, pp. 42-43, 87, plate I; 10, pp. 8, 9). The soil underlying the site is gravelly sandy clay loam of the Madison-Urban series, exhibiting moderate permeability. It consists of a 5-inch layer of brown sandy clay loam, 38 inches of red subsoil of mixed clay loam and clay, extending at least 52 inches, as weathered mica schist (Ref. 7, pp. 22, Sheet Number 16). The Palmetto Granite is coarse-grained porphyritic granite that intruded into metamorphic rocks of the Atlanta Group approximately 300 to 325 million years ago (Ref. 10, pp. 23, 42, 87).

The aquifer of concern in the area is the unconfined residual soil/crystalline rock aquifer system (Ref. 8, plate I). Groundwater is contained within the pore spaces of the surficial deposits (collectively known as regolith) and in the joints, fractures, and other secondary openings in the bedrock. The regolith is composed of soil, saprolite (weathered rock), stream alluvium, colluvium, and other surficial deposits (Ref. 9, pp. 1, 8-9). Hydraulic conductivity values for the residual soil/crystalline rock aquifer system are estimated to range from 1 x 10<sup>-5</sup> to 1 x 10<sup>-7</sup> cm/sec (Ref. 13, p. 29). The groundwater is recharged by precipitation entering through bedrock openings in outcrop areas or by seeping through the regolith (Ref. 9, p. 9). The depth to the water table is highly dependent on

topography and changes in precipitation (Ref. 9, pp. 5, 9). Based on an analysis of a topographic map of the area surrounding the GHFA site, the depth to groundwater is estimated to range from 30 to 50 feet below land surface (Ref. 1). Wells drilled in this area ranged from 35 to 2,100 feet deep and typically yield at least 20 to 275 gallons per minute (Refs. 8, pp. 99-105; 9, p. 1). The direction of groundwater flow is generally toward the unnamed pond and then to Snake Creek, and then flows to the north towards Wahoo Creek. However, the extent of pore spaces in the regolith also affects groundwater flow (Refs. 1; 9, pp. 9, 11, 12).

#### 3.2 Groundwater Targets

The nearest residences, in the Pinecrest subdivision, Sherwood Forest subdivision, and the City of Newnan receive their water from Newnan Water & Light. Approximately 75% of the population within the 4-mile radius obtains their drinking water from surface water intakes located on White Oak Creek, Sandy Creek and Line Creek and a series of reservoirs. The reservoirs (Newnan Waterworks Lakes) are 4 miles south of the site in question and are not along the surface water pathway (Ref. 15).

The private wells within the 4-mile radius from the site are screened at 212-390 feet deep for water (Ref. 8, pp. 99-105). One thousand four hundred and sixty eight (1,468) residents within 4 miles and eleven (11) residents within 0.25 mile of the site rely on drinking water wells (Ref. 15).

#### 3.3 Groundwater Conclusions

There is no confirmed release of contaminants to the groundwater, but it may have occurred.

#### 4.0 SURFACE WATER PATHWAY

#### 4.1 Hydrogeologic Setting

The surface water pathways consist of ditch next to the site, western edge of the property. Due to the topography of the area, it is suspected that the groundwater flow from the site is flowing to the west (Fig. 2).

#### 4.2 Surface Water Targets

There are no drinking water intakes within 15 downstream miles of the site. Most residents within the 4-mile radius from the site obtain their drinking water from one primary surface water intake located on White Oak Creek near Big Popular Road (7 miles east of the site) and two secondary intakes located Sandy Creek near Corinth Road (5 miles south of the site) and Line Creek near Highway 54 at the county line (11 miles east of the site). The Newnan Water and Light removes approximately 2 to 3 million gallons per day from White Oak Creek. The other intakes are only used during the winter months (Refs. 14 and 15). The small unnamed pond, Snake Creek and Wahoo Creek within 9 miles of the site are not known as fishery areas. The Chattahoochee River is used for fishing (channel catfish, striped bass, and crappies) (Ref. 15). The wetlands occurring in the area are associated with Snake Creek and Wahoo Creek (Ref. 3). This site lies outside of the 500-year floodplain (Ref. 2).

#### 4.3 Surface Water Conclusions

No signs of stressed vegetation were noted. The bodies of water that are in the drainage pattern from the site are as follows: small unnamed pond, Snake Creek for 2 miles, Wahoo Creek for 7 miles, and then the Chattahoochee River. The Chattahoochee River is used for recreational fishing.

#### 5.0 SOIL EXPOSURE AND AIR PATHWAYS

#### 5.1 Physical Conditions

The site is in an residential area. The public has unrestricted access to the area.

#### 5.2 Soil and Air Targets

The nearest residence is less than 100 feet and the nearest community is 1 mile away (Figs. 1 and 2, Ref. 1). Forty four (44) people, including 3 people onsite, live within a 0.25 mile of the site and 19,721 people live within 4 miles from the site (Ref. 4). The City of Newnan has a population of 12,497 (Ref. 16). Wetlands exist in the 4-mile radius as stated in Section 4.2 of this report.

Pursuant to the Georgia Endangered Wildlife Act of 1973 and the Federal Endangered Species Act of 1973, no wildlife is designated as a state and federally protected species (classified as endangered wildlife) whose range of habitat includes Coweta County (Ref. 5).

Pursuant to the Georgia Wildlife Preservation Act of 1973, <u>Platanthera integrilabia</u> (Correll) Luer (Monkeyface Orchid or White Fringeless Orchid) is designated as state protected species (classified threatened plants) whose range of habitat include Coweta, Carroll, Chattooga, Cobb, Forsyth, Rabun and Stephens Counties (Ref. 6). Additionally, <u>Platanthera integrilabia</u> (Correll) Luer is designated as a federally protected species (classified as a candidate plant) whose range of habitat includes Coweta County (Ref. 6).

The above protected flora and fauna were not designated as terrestrial sensitive environments for the soil or air pathways due to the fact that none of the protected species were observed on-site or off-site during the reconnaissance.

#### 5.3 Soil Exposure and Air Pathway Conclusions

Access to the site is unrestricted, but the soil pathway does not appear to be a threat due to the removal of the wooden deck and soil beneath the deck. There has been no documented release to the atmosphere.

#### 6.0 SUMMARY AND CONCLUSIONS

From March 1986 to 1988 the property on 20 Lake Shore Drive was treated several times for termites using chlordane termiticide. An employee of the Ryder Pest Control Company made a pesticide application (chlordane) in a manner not suitable, and inconsistent with labeling restrictions, to a wooden deck at the rear of the house. The chlordane was tracked into the living areas of the house. Subsequent sampling of the interior of the house, including air samples from the living areas and basement and wipe samples of carpet and HVAC ducts indicated the presence of chlordane. Bulk

samples of soil from around the house foundation walls and from the area of the deck indicated the presence of chlordane. The deck was subsequently removed and replaced in May 1988, and a portion of the soil beneath the deck was also removed. Testing of the site in 1991 provided information that a high level of termiticide remained in the foundation, soils and interior of the dwelling. In September 1995, Law Engineering and Environmental Services, Inc. (Law) collected six shallow soil samples at five locations in the area of the deck to further evaluate the actual soil concentrations. The analytical results indicated that the maximum concentration for chlordane and heptachlor were 230  $\mu$ g/kg and 7.1  $\mu$ g/kg, respectively. Other studies have reported chlordane concentrations as high as 36 mg/kg at locations other than the deck area. However, the chlordane levels at these locations are consistent with residual values from a normal application, and appeared to be the result of a normal application of the pesticide. In March and April 1996, the house was demolished and removed to an appropriate landfill. In February 1997, a new 1,272 square-foot home was brought in and placed upon area where the former house was located. The Chattahoochee River is a fishery. There is no primary drinking water intake 15-mile downstream of the water flow. No confirmed release of hazardous material has occurred to the groundwater, surface water, and air pathways.

#### 7.0 IMPORTANT ASPECTS OF THIS PRELIMINARY ASSESSMENT

#### 7.1 Land Ownership

Danny R. Buck purchased the property from GHFA on October 22, 1996 and then transferred the property to Richard Homes, Inc. on November 21, 1996.

#### 7.2 Water Flow Data

Mr. Dudley Buchanan of Newnan Water and Light informed me that the average water flow below and above the water discharge point on Wahoo Creek in the City of Newnan was 0.4 and 5.2 cfs respectively (Ref. 14). He also told me that the average water flow at the surface water intake on White Oak Creek is 16.8 cfs. On September 23, 1997 upon contacting the USGS Water Resources (Roger McFarlene) at (770) 903-9100 to obtain water flow data on Wahoo Creek and Chattahoochee River, I was informed that the average flow data is 26 cfs and 4,177 cfs respectively.

#### REFERENCES

- U.S. Geological Survey, 7.5 minute topographic quadrangle maps of Georgia; Newnan North, 1965 (Photorevised (PR) 1982); Newnan South, 1965 (PR) 1973; (Photoinspected (PI) 1981); Newnan SW, 1965 (PR) 1982; Whitesburg, 1965 (PR) 1982.
- U.S. Department of Housing and Urban Development, Flood Hazard Boundary Map of Coweta County. Georgia, 2 August 1982.
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- Frost Associates, Centracts Report; Georgia Housing & Finance Authority: Newnan, Georgia, Essex, CT: 25 September 1997.
- Odom, Ron R., Georgia's Protected Wildlife, Georgia Department of Natural Resources, Game and Fish Division, Endangered Wildlife Program, 15 September 1977.
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- Clark, John S., Ground-Water Resources of the South Metropolitan Atlanta Region, Georgia, Information Circular 88, 1991.
- McConnell, Keith, <u>Geology of the Greater Atlanta Region</u>, Georgia Department of Natural Resources, Environmental Protection Division, Bulletin 96, 1984.
- 11. Davis, Kenneth, Significant Ground-Water Recharge Areas of Georgia, Hydrologic Atlas 18, 1989.
- Trent, Victoria, Ground-Water Pollution Susceptibility Map of Georgia, Hydrologic Atlas 20, 1992.
- Freeze, Allan R., Groundwater, Englewood Cliffs, N.J.: Prentice Hall, 1979.
- 14. Sibley, David, Superintendent of Newman Water & Light, Phone Call. 22 September 1997.
- Buchanan Dudley, Water Resource Manager of Newnan Water & Light, Phone Call. 22 September 1997.
- 16. Georgia County Government Magazine Yearbook 1997, Volume 48, Number 13, April 1997.
- U.S. Department of Commerce, <u>Proof copy table generated for Census 1990, CPH1: Summary Population and Housing Characteristics</u>, Bureau of Census, April 1991.

Appendix A

#### APPENDIX A

OMB Approval Number: 2050-0095 Approved for Use Through: 1/92

# PA Scoresheets

Site Name: Reportly of Georgia Howing & Firence Address: James Sliwinski

CERCLIS ID No.: GA 0001897768

Street Address: 20 Lake Shore Drive

City/State/Zip: Newman, GA 30263

Date: September 30, 1997

#### **GENERAL INFORMATION**

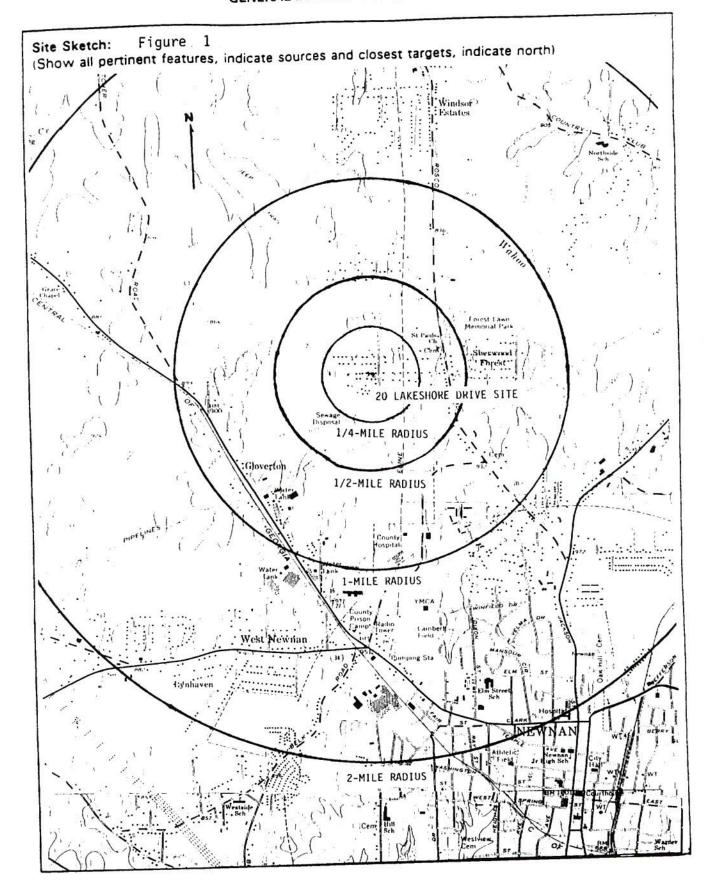
#### Site Description and Operational History:

The 0.4-acre site is along the south side of Lake Shore Drive and is characterized by a 1,272 square-foot home with a gravel-covered driveway. No fence secures the perimeter of the site. There is a down gradient slope along the western edge of the property. The area surrounding the site can best be described as residential with the nearest home being less than 100 feet from the site.

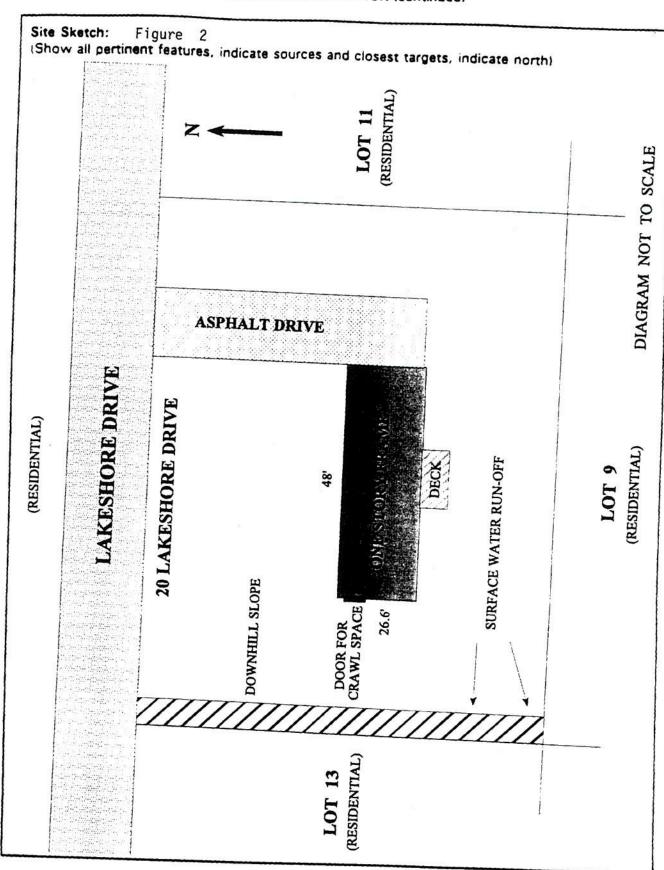
The property had several different owners since 1967. From March 1986 to 1988 the property was treated several times for termites using chlordane termiticide. An employee of the Ryder Pest Control Company made a pesticide application (chlordane) in a manner not suitable, and inconsistent with labeling restrictions to a wooden deck at the rear of the house. The chlordane was tracked into the living areas of the house. Sampling of the interior of the house, including air samples from the living areas and basement and wipe samples of carpet and HVAC ducts indicated the presence of chlordane. Bulk samples of soil from around the house foundation walls and from the area of the deck indicated the presence of chlordane. The deck was subsequently removed and replaced by the pest control operator in May 1988, and a portion of the soil beneath the deck was also removed. Testing of the site in 1991 provided information that a high level of termiticide remained in the foundation, soils and interior of the dwelling. In September 1995, Law Engineering and Environmental Services, Inc. (Law) collected six shallow soil samples at five locations in the area of the deck to further evaluate the actual soil concentrations. All results were just below the Georgia Environmental Protection Division (EPD) Notification trigger levels of 9.2 mg/kg for chlordane and 0.66 mg/kg for heptachlor. On July 3, 1996 EPD notified GHFA that based upon available information it has determined that the release of chlordane and heptachlor to the soils beneath the deck does not meet the criteria for notification. In March and April 1996, the house itself was demolished and removed to an appropriate landfill. See attachment Appendix E. In February 1997, a new 1,272 square-foot home was brought in and placed upon area where the former house was located.

#### Probable Substances of Concern: (Previous investigations, analytical data)

An employee of the Ryder Pest Control Company made a pesticide application (chlordane) in a manner not suitable, and inconsistent with labeling restrictions to a wooden deck at the rear of the house. The chlordane was tracked into the living areas of the house. Subsequent sampling of the interior of the house, including air samples from the living areas and basement and wipe samples of carpet and HVAC ducts indicated the presence of chlordane. Bulk samples of soil from around the house foundation walls and from the area of the deck indicated the presence of chlordane. The deck was subsequently removed and replaced by the pest control operator in May 1988, and a portion of the soil beneath the deck was also removed. Confirmatory sampling of the soils during removal was not conducted. Testing of the site in 1991 provided information that a high level of termiticide remained in the foundation, soils and interior of the dwelling. In September 1995, Law Engineering and Environmental Services, Inc. (Law) collected six shallow soil samples at five locations in the area of the deck to further evaluate the actual soil concentrations. Analytical results indicated that the maximum concentration for chlordane and heptachlor were 230 µg/kg and 7.1 µg/kg, respectively. See attachment Appendix E.



### GENERAL INFORMATION (continued)



#### SOURCE EVALUATION

	Source Name: Conteminated Soil  The Estimated  For contaminated soil  acre	Source Waste Quantity (WQ) Calculations:  Estimated dimensions of the source:  Tier: Area  <
Source No.: Source Description	Source Name:	Source Waste Quantity (WQ) Calculations:
Source No.: Source Description	Source Name:	Source Waste Quantity (WQ) Calculations:

Site WC:

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## PA TABLE 1: WASTE CHARACTERISTICS (WC) SCORES

# PA Table 1a: WC Scores for Single Source Sites and Formulas for Multiple Source Sites

		emet E SO	URCE SITES (assigned WC sc	ores)	MULTIPLE SOURCE SITES
	SOURCE TYPE	WC = 18	WC = 32	WC = 100	Formula for Assigning Source WQ Values
COE ST - 1- DWE	N/A	≰100 lb	> 100 to 10,000 lb	> 10,000 fb	10 + 1
7 4	N/A	≤ 500,000 tb	> 500,000 to 50 million to	>50 million to	10 + 5,000
£	Landfill	≤6.75 million ft <sup>3</sup> ≤250.000 yd <sup>3</sup>	>8.75 million to 675 million ft <sup>3</sup> >250,000 to 25 million ye <sup>3</sup>	> 675 million ft <sup>2</sup> > 25 million yd <sup>3</sup>	$ft^2 + 67.500$ $yd^2 + 2.500$ $ft^2 + 67.5$
	Surface impoundment	≤8,750 ft² ≤250 yd²	>6.750 to 675,000 ft <sup>3</sup> >250 to 25,000 ys <sup>3</sup>	>675,000 ft <sup>3</sup> >25,000 yt <sup>3</sup> >100,000 drums	yd <sup>3</sup> + 2.5 drums + 10
٧	Drums	≤1,000 drums ≤50,000 gallens	>1,000 to 100,000 drums >50,000 to 5 million gallons	>5 million gallone	gallons + 500
7 L D M	Tanks and non- drum containers	≤6.75 multion ft <sup>3</sup> ≤250.000 yd <sup>3</sup>	>6.75 million to 675 million ft <sup>3</sup> >250.000 to 25 million ye <sup>3</sup>	>675 million ft <sup>3</sup> >25 million yd <sup>3</sup>	אר + 67,500 : אר + 2,500
	Contaminated soil	≤8.750 ft <sup>3</sup> ≤250 yg <sup>3</sup>	> 6,750 to 675,000 ft <sup>3</sup> > 250 to 25,000 ye <sup>2</sup>	>675,000 ft <sup>3</sup> >25,000 ye <sup>3</sup>	$ft^3 + 67.5$ $yd^3 + 2.5$
	Pile	≤8.750 ft <sup>3</sup> ≤250 ye <sup>3</sup>	>6.750 to 675.000 ft <sup>2</sup> > 250 to 25.000 vs <sup>2</sup>	>675,000 ft <sup>3</sup> >25,000 vt <sup>3</sup>	ft <sup>3</sup> + 67.5 yd <sup>3</sup> + 2.5
_	Landfill	≤340,000 ft <sup>2</sup> ≤7.8 seres	>340,000 to 34 million ft <sup>2</sup> >7.8 to 780 seres	>34 million ft <sup>2</sup> >780 seree	ft <sup>2</sup> + 3,400 acres + 0.078 ft <sup>2</sup> + 13
	Surface	≤1,300 ft <sup>3</sup> ≤0.029 seree	> 1,300 to 130,000 ft <sup>2</sup> > 0.029 to 2.3 seres	>130,000 ft <sup>2</sup> >2.9 scree	acres + 0.00025
1		≤3.4 million ft <sup>2</sup> ≤78 acres	>3.4 million to 340 million ft <sup>8</sup> >78 to 7.800 ecres	>340 million ft <sup>2</sup> >7,800 sores >130,000 ft <sup>2</sup>	ecres + 0.78
1 3	Pile*	≤1,300 ft² ≤0.028 seree	>1,300 to 130,000 ft <sup>2</sup> >0,029 to 2.9 seres	>2.9 seree >2.7 million ft <sup>2</sup>	acres + 0.0002 ft² + 270
	Land treatment	≤27,000 ft <sup>2</sup> ≤0.62 scree	>27,000 to 2,7 million ft <sup>2</sup> >0.62 to 62 seres	>62 seree	acres + 0.006

<sup>1</sup> ton = 2,000 fb = 1 yelf = 4 drums = 200 gallens

PA Table 1b: WC Scores for Multiple Source Sites

WQ Total	WC Soor
>0 to 100	10
100 to 10.000	32
>10.000	100

<sup>\*</sup> Use area of land surface under pile, not surface area of pile.

### GROUND WATER PATHWAY GROUND WATER USE DESCRIPTION

Describe Ground Water Use Within 4-miles of the Site:
(Describe stratigraphy, information on aquifers, municipal and/or private wells)

The GHFA site is located in the Southern Piedmont belt of the Piedmont physiographic province (Refs. 9, p. 3; 10, pp. 2-3). Underlying the GHFA site are surficial deposits of residual soil and weathered rock (amphibolite, gneiss, and schist) (Refs. 10, pp. 42-43, 87, plate I; 10, pp. 8, 9). The aquifer is an unconfined residual soil/crystalline rock aquifer system (Ref. 9, pp. 1, 8-9). Recharge to the groundwater is through precipitation (Ref. 9, p. 9). The depth to groundwater is estimated to range from 30 to 50 feet deep and typically yield at least 40 to 124 gallons per minute. The nearest well to the site is approximately 212 feet deep (Refs. 8, pp. 99-105; 9, p. 1).

#### Calculations for Drinking Water Populations Served by Ground Water:

The nearest residences, in the Pinecrest subdivision, Sherwood Forest subdivision, and the City of Newnan, receive their drinking water from Newnan Water & Light. Approximately 75% of the population within the 4-mile radius obtains their drinking water from surface water intakes located on White Oak Creek, Sandy Creek and Line Creek and a series of reservoirs (Ref. 15). The reservoirs, Newnan Waterworks Lakes, are 4 miles south of the site in question and are not along the surface water pathway (Ref. 1). The private wells within the 4-mile radius from the site are screened at 212-390 feet deep for water (Ref. 8, pp. 99-105). The information on drinking water populations served by groundwater is from the Centract Report with site longitude = 84.4903 and latitude = 33.2421 (Ref. 4).

GROUND WATER PAT	HWAY CRITERIA LIST
SUSPECTED RELEASE	PRIMARY TARGETS
Y N U e o n s k & = = Are sources paorly contained?	Y N U 9 o n 5 k = Z = is any drinking water well nearby?
S = Is the source a type likely to contribute to ground water contamination (e.g., wet lagoon)?	☐ ☎ ☐ Hes any nearby drinking water well been closed?
□ 💢 🗀 (a weste quantity particularly large?	□ 宮 □ Has any nearby drinking water user reported foul-testing or foul-smelling water?
□ □ Is precipitation heavy?	☐ ※ ☐ Does any nearby well have a large drawdown or high production rate?
コヌ Is the infiltration rate high?	二名 二 Is any drinking water well located between the site and other wells that are suspected to be exposed to a hazardous substance?
□ 本 □ Is the subsurface highly permeable or conductive?	Does analytical or circumstantial evidence suggest contamination at a drinking water
S = Is drinking water drawn from a shallow aquifer?	well?  □ ※ □ Does any drinking water well warrant
☐ ★ ☐ Are suspected contaminants highly mobile in ground water?	sampling?
□ □ 및 Does analytical or circumstantial evidence suggest ground water contamination?	□ ⊠ PRIMARY TARGET(S) IDENTIFIED?
☐ 및 Other criterie?	
☐ X SUSPECTED RELEASE?	
Summanze the rationale for Suspected Release (attach an additional page if necessary):	Summerize the rationale for Primery Targets (attach an additional page if necessary):
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e .	
si	
ONE OF	

#### GROUND WATER PATHWAY SCORESHEET

	Pethwey Characters pos			
	Do you suspect a release (see Ground Water Pathway Criteria List, page 71?	Yes	No X	
	is the site located in warst terrain?	Yes		
	Depth to aquifer:  Oistance to the nearest drinking water well:		145 "	
	Distance to the yearest structud mater mell:		3640 "	
		A	6	
		Supported	No Supposed	
<u>_</u>	KELIHOOD OF RELEASE	Release	Release	References
1,	SUSPECTED RELEASE: If you suspect a release to ground water (see page 7),	148		
1	assign a score of 550. Use only column A for this pathway.	1		
	2-3-400555 36-6-6-6-6-6-6-6-6-6-6-6-6-6-6-6-6-6-6-		140 - 145	
2	NO SUSPECTED RELEASE: If you do not suspect a release to ground water, and			
1	the site is in karst terrain or the depth to aquifer is 70 feet or less, assign a score			
1	of 500; otherwise, assign a score of 340. Use only column 8 for this pathway.		340	_
_			340	8,9,10,12
	LR =	Į .	340	
			240	
	ARGETS			
1	PRIMARY TARGET POPULATION: Determine the number of people served by	1		
1	drinking water wells that you suspect have been exposed to a hazardous	1		
1	substance from the site (see Ground Water Pathway Criteria List, page 7).	1		
	people x 10 =	ł		
}		<del></del>		) <u>Name and a second</u>
4	SECONDARY TARGET POPULATION: Determine the number of people served by	}		
1	arrinking water wells that you do NOT suspect have been exposed to a hazardous			
}	substance from the site, and assign the total population score from PA Table 2.			
1	Are any wells part of a blended system? Yes No X			
	If yes, attach a page to snow apportionment calculations.		73	4.15
5	NEAREST WELL: If you have identified a primary target population for ground		Witter.	-
•	water, assign a score of 50; otherwise, assign the Nearest Well score from	1		
	PA Table 2. If no drinking water wells exist within 4 miles, assign a score of zero.	1	20	
		Ates	AL.	
6.	WELLHEAD PROTECTION AREA (WHPA): If any source lies within or above a WHPA,			
	or if you have identified any primary target well within a WHPA, assign a score of 20;	1	_	
	assign 5 if neither condition holds but a WHPA is present within 4 miles; otherwise		0	8,15
1	assign zero.	***	100	
7.	RESOURCES		_	
			5	
			98	
	τ.		10	
W	ASTE CHARACTERISTICS			
8.	A. If you have identified any primary target for ground water, assign the wasts	ł 1		
	characteristics score calculated on page 4, or a score of 32, whichever is			
	GREATER; do not evaluate part 8 of this factor.		10.2 . 10-	
	B. If you have NOT identified any primary target for ground water, assign the			
	waste characteristics score calculated on page 4.		18	
			10	
	wc =	1	18	
	- "" -	<u></u>		
		inema h c n		
GF	ROUND WATER PATHWAY SCORE: LR x T x WC			
	82.500	7	. 1	
		7.3	)	

PA TABLE 2: VALUES FOR SECONDARY GROUND WATER TARGET POPULATIONS

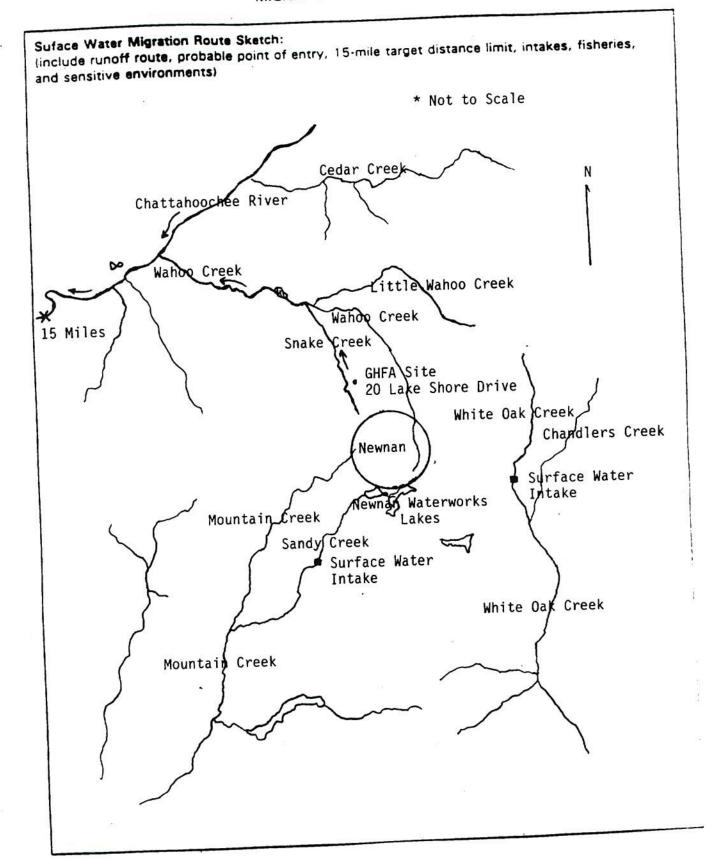
PA Table 2a: Non-Karst Aquifers

		Noarest			Popul	Population Served by Wells Within Distance Category	ved by W.	Ms Within	Distance	Cetegon			
		No.V	-	=	3,	101	100	1,001	1 001	10,001	30,001	Dreste.	
Distance		(choose	2	2	3	2	3	2	2	:	2	thes.	Population
from Site	Population	Mghest)	20	30	100	305	1.000	3,000	10.000	30,000	100.000	100.000	Value
O to X mile	11	(2)	-	0	9	91	52	163	521	1,633	6,214	16,325	7
> 14 to 15 mile	33	:	-	-	<u></u>	2	35	101	323	1,012	3,233	10,121	8
> 1, to 1 mile	207		~	-	7	<b>©</b>	22	62	167	522	1,668	5,224	2
> 1 to 2 miles	1136	ø	-	-	-	n	n	<b>(2)</b>	94	294	939	2,938	29
> 2 to 3 males	2147	٦	-	-	-	2	,	3	89	212	678	2,122	12
> 3 to 4 miles	1394	7	-	-	-	-	•	3	45	2	7	1,306	13
Nes	Nearest Well = 20	50									•	Score =	73

PA Table 2b: Kerst Aquifers

		Noarost			Popu	letion Sen	Wyd bev	Population Served by Wells Within Distance Category	Distance	Category			
		No.		=	7	101	100	1,001	1001	10,001	30,001	Quesier.	
Distance		(use 20	2	2	3	3	2	2	2	3	•	( <b>A</b>	Population
from Site	Population for kerst!	for kerst)	10	30	100	300	1,000	3,000	10.000	30.000	100.000	100.000	Value
O to X mile		30	-	2	۵	2	93	163	521	1,633	5,214	16,325	
> K to K mile		8	-	-	r	2	32	101	323	1,012	3,233	10,121	-
> % to 1 mile		2	~	-		•	76	82	192	918	2,607	6,162	
>1 to 2 miles		8	-	-	-	•	78	82	192	918	2,607	8,162	
22 to 3 miles	-	o,	-	-	•	•	36	83	791	918	2.607	8,162	!
> 3 to 4 miles		20	-	-	3		36	92	192	918	2,607	8,162	
AaN	Noarast Well -					:					•,	Score *	20

## SURFACE WATER PATHWAY MIGRATION ROUTE SKETCH



SURFACE WATER PA	THWAY CRITERIA LIST
SUSPECTED RELEASE	PRIMARY TARGETS
Y N U e o n s k = X = is surface water nearby? = X = is waste quantity particularly large?	Y N U e o n s
□ ▼ □ Is the drainage area large?  ▼ □ □ Is rainfall heavy?  ▼ □ □ Is the infiltration rate low?	
Are sources poorly contained or prone to runoff or flooding?	Does analytical or circumstantial evidence suggest surface water contamination at or downstream of a target?
channel leading to surface water?  Is vegetation stressed along the probable runoff route?	Drinking water intake     Fishery     Sensitive environment
二 又 二 Are sediments or water unnaturally discolored?	☐ % Other criteria?
☐ ★ ☐ Is wildlife unnaturally absent?  ☐ ★ ☐ Has deposition of waste into surface water been observed?  ☐ ★ ☐ Is ground water discharge to surface water likely?	PRIMARY INTAKE(S) IDENTIFIED?  Reprimary Fishery(IES) IDENTIFIED?  PRIMARY SENSITIVE ENVIRONMENT(S) IDENTIFIED?
Does analytical or circumstantial evidence suggest surface water contamination?      Other criteria?      SUSPECTED RELEASE?	
Summarize the rationale for Suspected Release (attach an additional page if necessary):	Summarize the rationale for Primary Targets (attach an additional page if necessary):

## SURFACE WATER PATHWAY LIKELIHOOD OF RELEASE AND DRINKING WATER THREAT SCORESHEET

	Pethw	ev Charectanepos	_			1
	On you suspect a release "see Surface Water F Distance to surface water: Fixed frequency:	Pathway Cotena List.		Yes	550 "	
	What is the downstream distance to the neare Nearest fishery? > 9 miles Nearest ser	st drimking water inta sitive environment?	<1/4 mile	miles s		
V E 1	HOOD OF RELEASE			Suspensed	No Suspensed	Í
EL	HOOD OF RELEASE			Release	Release	References
SU	SPECTED RELEASE: If you suspect a release to su	rface water (see page	11),	446		
433	ign a score of 550. Use only column A for this par	inway.				
NO	SUSPECTED RELEASE: If you do not suspect a re	lease to surface			w.m. =	
wa	ter, use the table below to assign a score based on ter and flood frequency. Use only column 8 for this	distance to surface				
	and the mode in equality. One only condition by the	petriway.			1	
	Distance to surface water ≤ 2.500 feet	500			8	
	Distance to surface water > 2,500 feet, and					
	Site in annual or 10-year floodplain	500				
	Site in 100-year floodplain	400			ì	
	Site in 500-year floodplain	300			1	
	Site outside 500-year floodplain	100	ŝ		500	
				140	500	$\frac{1,2}{}$
				, <del></del>		
			LR = j		500	
PRIN	MARY TARGET POPULATION: If you suspect any one has been exposed to a hazardous substance from way Criteria List, page 11), list the intake name(s)	n the site (see Surfac	listed a Water			
EC	ONDARY TARGET POPULATION: Determine the riting water intakes that you do NOT suspect have b	people sen	e x 10 =			
	Are any intakes part of a blended system? Ye if yes, attack a page to show apportunement car	ns No <u>X</u> culations.		MARIE .	163	5لې4ل
drini Near	REST INTAKE: If you have identified a primary targ ting water threat (factor 4), assign a score of 50; o est Intake score from PA Table 3. If no drinking w arget distance limit, assign a score of zero.	therwise, assign the			0	
	DURCES		1	104	5	
-					2	
			Т =	10	168	
			_			

## SURFACE WATER PATHWAY (continued) HUMAN FOOD CHAIN THREAT SCORESHEET

	RELEASE				Release	No Suspensed	References
	Likelihood of Release score t	from page 12.	L	R -	144	500	
	HAIN THREAT TARGET						K
the target distan	er body type and flow lif app nce limit. If there is no fisher ssign a Targets score of 0 at	y within the target					
Fehery Name		Weter Body Type	Few				
	boochee River	River	4,177_cfs cfs cfs				
		-	cts				
L							_15_
9. PRIMARY FISHE				- 1			(4)
to a nazardous :	substance from the site (see of 300 and do not evaluate F				:		
to a nazardous s	of 300 and do not evaluate F				184		
to a nazardous :	of 300 and do not evaluate F				, <del>178</del>		
to a nazardous sassign a score of the score	SHERIES  release to surface water an	actor 10. List the pr	nmary fishenes:		u=q		
to a nazardous sassign a score of the score	of 300 and do not evaluate F	actor 10. List the pr	nmary fishenes:		.#4		
to a nazardous : assign a score of 10. SECONDARY FI A. If you suspect a but no primary fi B. If you do not su	SHERIES  release to surface water an	d have identified a si 0.	econdary fishery			(PASS e 12	
to a nazardous : assign a score of 10. SECONDARY FI A. If you suspect a but no primary fi B. If you do not su	SHERIES  I release to surface water an fishery, assign a score of 21 isspect a release, assign a Secret and Se	d have identified a si 0.	econdary fishery ore from the table			UNAN e 18	
to a nazardous : assign a score of 10. SECONDARY FI A. If you suspect a but no primary fi B. If you do not su	ISHERIES I release to surface water an fishery, assign a score of 21 ispect a release, assign a Section at any fishery of the surface water and the surface water and surface	d have identified a se 0. condary Fishenes soo within the target dist	econdary fishery ore from the table			1746.8% a 18	
to a nazardous : assign a score of 10. SECONDARY FI A. If you suspect a but no primary fi B. If you do not su	ISHERIES I release to surface water an fishery, assign a score of 21 ispect a release, assign a Section of the surface water and ispect a release, assign a Section of the surface water flow at any fishery of the surface water flow.	d have identified a so 0. condary Fishenes soo within the target dist	econdary fishery ore from the table		. <b>₽</b>	12MAN a 18	
to a nazardous : assign a score of 10. SECONDARY FI A. If you suspect a but no primary fi B. If you do not su	ISHERIES Is release to surface water an fishery, assign a score of 21 ispect a release, assign a Section at any fishery to the surface water flow at any fishery to the surface water and the surface water water and the surface water and the surface water water water and the surface water water wat	d have identified a so  condary Fishenes soo within the target dist  Secondary Mohare  210	econdary fishery ore from the table			1296.80k at 128	
to a nazardous sassign a score of assign a score of the s	ISHERIES Is release to surface water an fishery, assign a score of 21 ispect a release, assign a Section of the surface water flow at any fishery of the surface of the sur	d have identified a so  condary Fishenes soo within the target dist  Secondary Mohare  210	econdary fishery ore from the table			(PAEL e 13	
to a nazardous sassign a score of assign a score of the s	ISHERIES Is release to surface water an fishery, assign a score of 21 ispect a release, assign a See lowest flow at any fishery to 2 to	d have identified a set of the process of the proce	econdary fishery ore from the table		·F-6		

PA TABLE 3: VALUES FOR SECONDARY SURFACE WATER TARGET POPULATIONS

		Nearest				pordetion	Served by	Intakes !	Population Served by Intakes Within Flow Category	v Cetegor	*			
Surface Weller		Intoko	~	5	701	ğ	1,881	1001	10,001	30,001	100,001	300.001	Oreste	
most trom	1	(choose	3	2	2	3		3	2	2	3		4	Population
(500 FA Table 4)	2	()Seppositi	2	3	200	1,000	3,000	70,000	30.00	700.000	8	1,000,000 1,000,000	1,000,000	Vake
< 10 als		R	~	۵	2	52	183	621	1,633	6,214	18,326	62,138	183,246	
10 to 100 cfe	वहां भ	0	-	-	~	٠	•	29	3	621	1,633	6,214	16,325	163
> 100 to 1,000 ele	-	-	•	•	-	-	~	۵	:	29	:	621	1,633	
> 1,000 to 10,000 ofe		۰	٥	۰	۰	•	-	-	~	۵	2	62	26.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
> 10,000 cle or Greet Lebes		۰	۰	•	۰	•	•	•	-	-	~	۵	2	
3-male Mixing Zone		01	-		•	26	23	261	9	2,607	6.162	26,068	61,663	
Neare	Nearest Intake -	7										Š	Score -	163

PA TABLE 4: SURFACE WATER TYPE / FLOW CHARACTERISTICS WITH DILUTION WEIGHTS FOR SECONDARY SURFACE WATER SENSITIVE ENVIRONMENTS

Type of Surfa	Type of Surface Water Body	Dilution
Water Body Type 0	OM Flow	Weight
minimal atream	< 10 cfe	•
email to moderate stream	10 to 100 cfe	0.1
moderate to large etream	> 100 to 1,000 cfe	N/A
large etream to nver	> 1,000 to 10,000 cts	N/A
large stver	> 10,000 ale	N/A
3-mile mixing zone of		
quet Rowing atteams or rivers	10 cle or greeter	V/N
coastel lidel water (harbors,		
sounds, bays, etc.), ocean,	N/A	N/N

## SURFACE WATER PATHWAY (continued) ENVIRONMENTAL THREAT SCORESHEET

KELIHOOD OF RE	LEASE				Rates	Release	Reference
ter Surface Water Lik		tore from page 12.		LR -		500	
NVIRONMENTAL "	THREAT TARGETS	I					
sensitive environments and 5). If there is	ent within the target	applicable) for each surfa distance limit (see PA Tal nent within the (arget dist bottom of the page.	iles 4				n
Environment Name		Weter Body Type	Aow				ĺ
Snake Cree	<del></del>	creek	4 26 cts				
Wahoo Cr		Creek	26 cts				
Chattahood	hee River	RIVET	4,177 01				
- SHETT WITCOM	1112		cts	53 6			
			cfs				1,3
	ena List, paga 11), a primary sensitive en	ssign a score of 300 and invironments:					
Surface Water Crit factor 13. List the factor 13. List the same secondary SEN: present, but none Sensitive Environm A. For secondary	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen	ITS: If sensitive environments environment, evaluate So	nents are acondary	-		2	
Surface Water Crit factor 13. List the  3. SECONDARY SEN: present, but none Sensitive Environm A. For secondary 100 cfs or less	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen	ETS: If sensitive environments environment, evaluate South on surface water bodies	nents are scondary is with flows of a part B of	-		,	
Surface Water Crit factor 13. List the factor 13. List the secondary SEN present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	ITS: If sensitive environment environment, evaluate Sints on surface water bodie flows, and do not evaluate  Severenment Type and to IPA Tables 6 and 61	nents are scondary is with flows of part 8 of	Total			
Surface Water Crit factor 13. List the factor 13. List the present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:  ###################################	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	FTS: If sensitive environments environment, evaluate Sints on surface water bodie flows, and do not evaluate	nents are econdary is with flows of a part 8 of	,			
Surface Water Crit factor 13. List the factor 13. List the present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:    Rew   Z.6   cfs	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	ITS: If sensitive environment environment, evaluate Sints on surface water bodie flows, and do not evaluate  Severenment Type and to IPA Tables 6 and 61	nerris are econdary as with flows of a part 8 of	Total		2	
Surface Water Crit factor 13. List the factor 13. List the secondary SEN present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:    Place   Z.G. cfs   cf	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	FS: If sensitive environment environment, evaluate Sonts on surface water bodie slows, and do not evaluate sont environment. Type and to IPA Tables 6 and 61 x Worthand	nents are acondary as with flows of a part 8 of	Total			
Surface Water Crit factor 13. List the factor 13. List the secondary SEN present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:  ###################################	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	Environments:  ETS: If sensitive environment environment, evaluate Sints on surface water bodie flows, and do not evaluate  Environment Type and to IPA Tobles 5 and 61  x Worthand	nents are acondary as with flows of a part B of	Total			
Surface Water Crit factor 13. List the factor 13. List the secondary SEN present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:    Place   Z.G. cfs   cf	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen , assign scores as for	Environments:  ETS: If sensitive environment environment, evaluate Sints on surface water bodie flows, and do not evaluate  Environment Type and to IPA Tobles 6 and 61  x Worldand  x	nents are acondary as with flows of a part 8 of	Total		150	
Surface Water Crit factor 13. List the factor 13. List the secondary SEN: present, but none Sensitive Environm A. For secondary 100 cfs or less this factor:  ###################################	SITIVE ENVIRONMEN s a primary sensitive sents based on flow. sensitive environmen assign scores as for Otheran Walphr (PA Table 4) C . }	TS: If sensitive environments environment, evaluate Sints on surface water bodie slows, and do not evaluate sints on surface water bodies slows, and do not evaluate sints are located on surface.	nerris are econdary	Total ISO		15.0	1,3

### PA TABLE 5: SURFACE WATER AND AIR PATHWAY SENSITIVE ENVIRONMENTS VALUES

Sensitive Environment	A/ 1/-/-
Critical habitat for Federally designated engangered or threatened species	Assigned Valu
Manne Sanctuary	100
National Park	
Compared Federal Wilderness Area	
Ecologically important areas identified under the Coastal Zone Wilderness Act	
Sensitive Areas identified under the National Estuary Program of Near Coastal Water Program of the Class Water	
Critical Areas identified under the Clean Lakes Program of the Clean Water Act (subareas in lakes or entire small lake	
Vetional Monument (air pathway only)	••,
National Sessions Recreation Area	
Netional Lakeshore Recreation Area	
Habitat known to be used by Federally designated or proposed endangered or threatened species	75
Vetional Preserve	,,
National or State Wildlife Refuge	131
Jnit of Coastal Barner Resources System	
ederal land designated for the protection of natural ecosystems	
Administratively Proposed Federal Wilderness Area	
Spawning areas critical for the maintenance of fish/shellfish species within a river system, bay, or estuary	
Vigratory pathways and feeding areas critical for the maintenance of anadromous fish species in a river system	
errestrial areas utilized for breeding by large or dense aggregations of vertebrate animals (air pathway) or	
semi-equatic foragers (surface water pathway)	
lational over reach designated as Recrestional	
fabitat known to be used by State designated endangered or threatened species	50
abitat known to be used by a species under review as to its Federal endangered or threatened status	50
cestal Berner (permally developed)	
ederally designated Scarie or Wild River	
tate land designated for wildlife or game management	25
tate designated Scanic or Wild River	45
tete designated Natural Area	
articular areas, relatively small in size, important to maintenance of unique biotic communities	
tate designated areas for protection/maintenance of aquatic life under the Clean Weter Act	•
See PA Table & (Surface	
Vedands	
PA Table 9 (Air P	orh w ev)

## PA TABLE 6: SURFACE WATER PATHWAY WETLANDS FRONTAGE VALUES

Total Length of Wetlands	Assigned Value
Less than 0.1 mile	0
O.1 to 1 mile	25
Greater than 1 to 2 miles	50
Greater then 2 to 3 miles	75
Greater then 3 to 4 miles	100
Greater than 4 to 8 miles	150
Greater than 8 to 12 miles	250
Greater then 12 to 16 miles	350
Greater than 16 to 20 miles	450
Greater than 20 miles	500

## SURFACE WATER PATHWAY (concluded) WASTE CHARACTERISTICS, THREAT, AND PATHWAY SCORE SUMMARY

	A	8_
	Suspented	No Suspensed
WASTE CHARACTERISTICS	Ralesso	Refesso
	;100 - 20g	
14. A. If you have identified any primary target for surface water ipages 12, 14,	1	
or 15), assign the waste characteristics score calculated on page 4, or a score	1	
of 32, whichever is GREATER; do not evaluate part B of this factor.		
		1100.00 100
8. If you have NOT identified any primary target for surface water, assign the		
waste characteristics score calculated on page 4.	1	10
		18
		10
WC =		10

SURFACE WATER PATHWAY THREAT SCORES

Threat	Liketihood of Release (LR) Seere (from page 12)	Torgota (T) Score (pages 12, 14, 15)	Pethwey Waste Characteristics (WCJ Secre (determined above)	Threat Score LR x T x WC / 82,500
Drinking Water	500	168	18	18.3
Human Food Chain	500	12	18	1.3
Environmental	500	15.0	18	1.6

SURFACE WATER PATHWAY SCORE
(Drinking Water Threat + Human Food Chain Threat + Environmental Threat)

21,2

SOIL EXPOSURE PA				ne vermentes. Pere 500-
SUSPECTED CONTAMINATION				RESIDENT POPULATION
	Y	0	Unki	le any socidence cohest or day, and facility
*		_		Is any residence, school, or daycare facility of or within 200 feet of an area of suspected contamination?
Surficial contamination can generally be assumed.	=	X	Ξ	Is any residence, school, or daycare facility located on adjacent land previously owned or leased by the site owner/operator?
	x	Ξ	Ξ	Is there a migration route that might spread hazardous substances near residences, schools, or daycare facilities?
	=	¥	3	Have onsite or adjacent residents or students reported edverse health effects, exclusive of apparent drinking water or air contamination problems?
	=	<b>=</b>	8	Does any neighboring property warrant sampling?
	=	X		Other criterie?
	8	$\exists$		RESIDENT POPULATION IDENTIFIED?

#### Summarize the rationale for Resident Population (attach an additional page if necessary):

There are six (6) residences within 200 feet of suspected contamination. The population for Cowetz County is 2.82 persons per household (Ref. 17). There are three people living on the property. The Resident Population is nineteen (19).

#### SOIL EXPOSURE PATHWAY SCORESHEET

	Pethway Characteristics		
	Do any people live on or within 200 ft of areas of suspected contamination?	Yes X No	( <u></u>
	Do any people attend school or daycare on or within 200 ft of areas		
	of suspected contamination?	Yes No	X
	Is the facility active? Yes No X If yes, estimate the number of workers:		
		Suspensed	
u	(ELIHOOD OF EXPOSURE	Contamination	References
T,	SUSPECTED CONTAMINATION: Surficial contamination can generally be assumed.	ma • 3	
	and a score of 550 assigned. Assign zero only if the absence of surficial		
	contamination can be confidently demonstrated.	550	
			11.
RE	SIDENT POPULATION THREAT TARGETS		
Γ.	RESIDENT POPULATION: Determine the number of people occupying residences		
1 4.	or attending school or daycare on or within 200 feet of areas of suspected		
	contamination (see Soil Exposure Pathway Criteria List, page 18).		
	19 people x 10 =	190	1,17
	and the second s		
3.	RESIDENT INDIVIDUAL: If you have identified a resident population (factor 2),	50	
1	assign a score of 50; otherwise, assign a score of 0.	TE TE E S	
4.	WORKERS: Use the following table to assign a score based on the total number of	i	
	workers at the facility and nearby facilities with suspected contamination:	1	
1	Member of Worksro Secre	i i	
	0 0	1	
	1 to 100 5	1	
1	101 to 1.000	l l	
1	>1.000	0	
1	PROPERTY AND ADMINISTRATION OF THE PARTY AND THE PARTY AND A VALUE OF THE PARTY AND ADMINISTRATION OF THE PARTY AND ADMINISTRA		9.
5.	TERRESTRIAL SENSITIVE ENVIRONMENTS: Use PA Table 7 to assign a value for each terrestrial sensitive environment on an area of suspected	1 1	
1	COUSTMINSDOU:	1	
1	Contamination.	1	
1	Terrestrial Sensitive Environment Type Value	1	
1		1	
		1 _ 1	¥8
1	Sum =	0	
1.	RESOURCES		
1	. nesounces	5	
_			
	T-	245	
M	VASTE CHARACTERISTICS		
·	ASTE CHARACTERISTICS	144.4	
1 7	. Assign the waste characteristics score calculated on page 4. WC =		
1		18	
			220
772			_
R	ESIDENT POPULATION THREAT SCORE: LE X T X WC 82.500	201	
	82,500	29.4	
	EARBY POPULATION THREAT SCORE:	MLOH	
2	AND PURCEURE RATIONAL ACCOR.		
	COIL EXPOSURE PATHWAY SCORE: Resident Population Threat + Nearby Population Threat	30.4	
•	Teachers Communication of Table of Communications	·····	
	2.		

			AIR PATHWAY	CRITERIA LIST
			SUSPECTED RELEASE	PRIMARY TARGETS
Y	о Х	) c x []	Are odors currently reported?	
Ξ	X	=	Has release of a hazardous substance to the air been directly observed?	If you suspect a release to air, evaluate all populations and
Ξ	=	8	Are there reports of adverse health effects (e.g., headaches, nausea, dizziness) potentially resulting from migration of hazardous substances through the air?	sensitive environments within 1/4 mile (including those onsite) as primery targets.
Ξ	Z	Ξ	Does analytical or circumstantial evidence suggest a release to the air?	
=	X		Other criteria?	ti .
Ξ	X		SUSPECTED RELEASE?	
				©

#### AIR PATHWAY SCORESHEET

	Pathway Characture des			1.00
	Do you suspect a release (see Air Pathway Criteria List, page 21)? Distance to the nearest individual:	Ye:	No X	
		A	8	
1 14 61 141	OOD OF RELEASE	Suspensed	No Suspensed Release	6.t
		140	74,000	References
	ECTED RELEASE: If you suspect a release to air (see page 21), assign a or 550. Use only column A for this pathway.	,	عيط	
	USPECTED RELEASE: If you do not suspect a release to air, assign a of 500. Use only column 8 for this pathway.		500	
	· ur -		500	
TARGET	<u> </u>			ľ
	ARY TARGET POPULATION: Determine the number of people subject posure from a suspected release of hazardous substances to the air.			
suspe	NDARY TARGET POPULATION: Determine the number of people not incred to be exposed to a release to air, and assign the total population using PA Table 8.		9	4
	REST INDIVIDUAL: If you have identified any Primary Target Population	MA/114	MILI .	
for th	tie air pathway, assign a score of 50; otherwise, assign the Nearest dual score from PA Table 6.		20	
IPA T	ARY SENSITIVE ENVIRONMENTS: Sum the sensitive environment values (FA Table 5) and wetland acreage values (FA Table 9) for environments subject posure from a suspected release to the air.			
	Sensitive Emiranment Type Value			<b>5.</b>
	Sum =			
	INDARY SENSITIVE ENVIRONMENTS: Use PA Table 10 to determine core for secondary sensitive environments.	{	1	3
1902/401/40	TO A TO BE ALATE OF THE REPORT OF THE CONTROL TO A SECURITY OF THE TO A TO A SECURITY OF THE T	100	1-4	-
8. RESC	DURCES		5	
	"T"-		35	
WASTE	CHARACTERISTICS			<b>●</b> 13 54 55
c	f you have identified any Primary Target for the air pathway, assign the waste haracteristics score calculated on page 4, or a score of 32, whichever is IREATER; do not evaluate part 8 of this factor.	100 23		
	you have NGT identified any Primary Target for the air pathway, assign the vaste characteristics score calculated on page 4.	.48.5 . 14	18 -	
	wc -		18	1
				<b>.</b> 1_
AIR PA	THWAY SCORE:  UR x T x WC 82,500	3	.8	
		3	σ.	1

PA TABLE 8: VALUES FOR SECONDARY AIR TARGET POPULATIONS

		Nearost				•	Spudetion	WATAN DE	Population Within Distance Category	PODON					
		Industrial		"	33	101	100	1,001	3001	10.001	38,001	100.001	300,007	Ameter	
Distance		(choose	1	8	2	2	3	1	4	3	3	1	_		Population
from Site	Population	(Machana)	2	2	300	3	1,000	3 000	70,000	30,000	700,000	300 000	7.000.000	_ :	Note:
į	3	8	Θ	~	۰	2	62	163	62)	1,633	6,214	16,325	62,130	163,346	-
>0 to X mile	#	8	_	-	Θ	•	2	Ŧ	3	3	1,303	4,081	13,034	40,811	_
V K to K sulla	134	~	•	۰	-	Θ	•	•	2	:	787	882	2,816	9.0.6	-
> k to 1 mile	828	-	۰	۰	•	-	Θ	•	•	2	2	192	834	2,612	4
>1 to 2 miles	4547	۰	•	۰	•	۰	-	-	•	•	11	:	798	3	3
>2 to 3 miles	8289	۰	•	•	۰	•	-	~	Θ	•	12	:	8	376	-
>3 to 4 miles	3526	٥	٥	٥	٥	۰	٥	-	Θ	7	,	23	23	238	4
Neerest 1	Meerest Individuel -	2											S	Score -	σ

PA TABLE 9: AIR PATHWAY VALUES FOR WETLAND AREA

Westerne Area	Assigned Value
Less then I core	•
) to 50 sores	*
Greater than 50 to 100 acres	3.6
Greater than 100 to 150 acres	126
Greeler then 150 to 200 acres	176
Greater then 200 to 300 acres	350
Greeter then 300 to 400 acres	350
Greeter then 400 to 500 acres	9
Greater then 500 ecres.	909

PA TABLE 10: DISTANCE WEIGHTS AND CALCULATIONS FOR AIR PATHWAY SECONDARY SENSITIVE ENVIRONMENTS

Distance Weigh	Distance	Sonstitue Endonment Type and Value Mean PA Table 6 or 91	-
Openio	0.10	ж	
		* Wettands (1550 acres) 25	0.62
0-1/4 mu	0-1/4 m 0.025		
	10		
		25 (25 SC 20 20 25	25 0.14
1/4-1/2m	1/4-1/2m 0.0054	×	
		=	

٥. ح

Total Environments Score -

#### SITE SCORE CALCULATION

3	S	S²		
GROUND WATER PATHWAY SCORE (S,,):	7.3	53.3		
SURFACE WATER PATHWAY SCORE (S.,.):	21.2	449.4		
SOIL EXPOSURE PATHWAY SCORE (S,):	30.4	924.1		
AIR PATHWAY SCORE (S.):	3.8	14.4		
SITE SCORE:	$\frac{S_{gw^2} + S_{sw^2} + S_{s^2} + S_{a^2}}{4}$	19.0		

#### SUMMARY

		YES	NO
1.	Is there a high possibility of a threat to any nearby drinking water well(s) by migration of a hazardous substance in ground water?	-	<b>X</b>
	A. If yes, identify the well(s).		20
	B. If yes, how many people are served by the threatened well(s)?		
2.	Is there a high possibility of a threat to any of the following by hazardous substance migration in surface water?		
	A. Drinking water intake	=	X
	B. Fishery	מחנו	Z
	C. Sensitive environment (wetland, critical habitat, others)  D. If yes, identify the target(s).		X
3.	Is there a high possibility of an area of surficial contamination within 200 feet of any residence, school, or daycare facility?		z
	If yes, identify the property(les) and estimate the associated population(s).		
4.	Are there public health concerns at this site that are not addressed by PA scoring considerations? If yes, explain:	0	×
		1	1

OMB Approval Number: 2050-0095 Approved for Use Through: 1/92

Potential Hazardous Waste Site Preliminary Assessment Form				m	Identification  State: CERCLIS Number: GA GADOO1897768  CERCLIS Discovery Date:			
1. General Site Information								
Hame: Property of Georgia How Finance Authority		Since Address: 20 Lake Shore Drive						
cin: Newnan		State: GA	Zip ( 302		County: Coweta	Co. Code:	Cong. Dist:	
			Approximate Area of Site:  O.4 Acres  Square Pt		Status of Site:  Status of Site:  Not Specified  Inactive NA (OW plume, etc.)			
2. Owner/Operator Info	rmation							
OWNER: Danny R. Buck (R	lichard Homes, Inc	Operato	ī.					
(b)(6) Personal Privacy	Street A	Street Address:						
City: (b)(6) Personal Privacy		City:	City:					
State: Zip Code: Telephone: State: Zip Code: Telephone: (b)(6) Personal Privacy								
Type of Ownership:  Private County Federal Agency Municipal Name Not Specified State Other			How Initially Identified:  Citizen Complaint PA Petition Incidental State/Local Program Not Specified RCRA/CERCLA Notification Other					
3. Site Evaluator Information								
Name of Evaluator: James D. Sliwinski	tion: PD   HW!	Date Prepared: MB 9/30/97						
Street Address: 205 Butlet St., S.E., 1154 East City: Atlanta State: GA					Α			
Name of EPA or State Agency Contact: Bill Mundy			Street Address: 205 Buttler St., S.E., East Tower, 1154				1154	
cir: Atlanta			State: GA	Telepho	hone: (404) 656-7802			
4. Site Disposition (for EPA use only)								
Emergency Response/Removal  Assessment Recommendation:  Yes  No  Date:  CERCLIS Recommendation:  Higher Priority SI  CHOWER Priority SI  NO  REFAP			Signature: Name (typed):					
	Other		Position:					

	CERCLIS Number:				
Potential Hazardous Waste Site Preliminary Assessment Form - Page 2 of 4	GA0001897768				
5. General Site Characteristics					
Commercial Mining Other Federal Facility	□ Urban & Suburban □ Rural	Years of Operation: Boginning Year 1986 Ending Year 1988			
Type of Site Operations (check all that apply):    Manufacturing (must check subcategory)		Waste Generated:  © Ounite Offsite Onsite and Offsite			
Paints, Varnishes	or Disposal	Waste Deposition Authorized By:    Present Owner   Pormer Owner   Present & Former Owner   Unauthorized   Unknown			
Metal Costing, Plating, Engraving	Waste Accessible to the Public:  ☐ Yes ☐ No				
Mining   "Converter"   Protective Filer"   Non-or Late File   Not Specified   Non-metallic Minerals   Other Residential	•	Distance to Nearest Dwelling, School, or Workplace:  4100 Feet			
6. Waste Characteristics Information					
Source Type: Source Waste Quantity: Tier : (check all that apply) (include units)		ste (check all that apply)			
Landfill   Surface Impoundment   Drums   Tanks and Non-Drum Containers   Chemical Wasts Pile   Scrap Metal or Junk Pile   Tailings Pile   Trash Pile (open damp)   Land Treatment   Contaminated Ground Water Plums (unidentified source)   Contaminated Surface Water/Sediment (unidentified source)   Si Contaminated Soil   A   Other	☐ Radioactive Waste ☐ Construction/Dem Waste  Physical State of Was apply): ☐ Solid				

900	EPA
	Ground

Potential Hazardous Waste Site

CERCLIS Number:

Prelimina	iry Assessment Form - Pa	ge 3 of 4		GAO	\$35568100	
7. Ground Water Pa	thway				•	
Is Oround Water Used for Drinking Water Within 4 Miles:	is There a Suspected Release to Gr Water:	round List Secondary Target Population Served by Ground Water Withdraws From:				
□ No	⊠ No		0 - 14 Mile			
Type of Drinking Water Wells Within 4 Miles (check all that	Have Primary Target Drinking Wat	LT	> ¼ - ¼ Mile	-	33	
apply):	Wells Been identified:	-	> 1/2 - 1 Mile	83 <del>3-1</del>	207	
S Private ☐ None	Ø No If Yes, Enter Primary Target Popul	ation:	>1 - 2 Miles	0	1136	
	People		> 2 - 3 Miles	-	2147	
			>3 · 4 Miles	-	1394	
Depth to Shallowest Aquifer:	Nearest Designated Wellhead Protest	tion	Total Within 4 h	(iles _	4928	
_150_ Feet	☐ Underties Site ☐ >0 - 4 Miles					
Karst Terrain/Aquifer Present:	20 None Within 4 Miles	•				
☐ Yes ⊠ No						
8. Surface Water Par	thway					
Type of Surface Water Draining Site at that apply):	nd 15 Miles Downstream (check all	Shortest Overland Distance From Any Source to Surface Water:  550 Foot				
Stream S River S	Pond Lake Other Creek					
		Milea				
Is There a Suspected Release to Surface  C Yes  No	c Water:	Site is Located in:  Annual - 10 yr Floodplain  > 10 yr - 100 yr Ploodplain  > 100 yr - 500 yr Floodplain  > 500 yr Floodplain				
Drinking Water Intakes Located Along  Yes  S No	the Surface Water Migration Path:	List AU S	econdary Target Drinking Water Body		kes: Population Served	
Have Primary Target Drinking Water Is	ntakse Been Identified:		Oak Creek	16.8	14,790	
If Yes, Enter Population Served by Prin	mary Target Intakes:					
	topie		Total within	15 Miles	0PC, 41	
Fisheries Located Along the Surface Wi	ater Migration Path:	Water	econdary Target Fisheries: Body/Fishery Name		Flow (cfs)	
Have Primary Target Fisheries Been Identified:  ☐ Yes  ☑ No		Cha	Hahoochee Ri	<u></u>	4,177	

Potential Hazardous Waste	Site -	CERCLIS Number:
Preliminary Assessment For	rm - Page 4 of 4	8955681 000 49
8. Surface Water Pathway (contin	ued)	,
Wetlands Located Along the Surface Water Migration Path:  ② Yes  □ No	Other Sensitive Environment Street	nents Located Along the Surface Water Migration Path:
Have Primary Target Wetlands Been Identified:  Yes No	Have Primary Target Sea	nsitive Environments Been Identified:
List Secondary Target Wetlands: Water Body Plow (cfs) Frontage Miles	List Secondary Target Se Water Body	Flow (cfs) Sensitive Environment Type
Snake Creek <26	Creek	= 26 Welland
Wahoo Creek 26 6		
Chattahoochee 4,177		
9. Soil Exposure Pathway		
<del></del>		
Attending School or Daycare on or Within 200	□ Nose or	ve Terrestrial Sessitive Environments Been Identified on Within 200 Feet of Areas of Known or Suspected
Contamination:	□ 101 - 1,000	otamination:
⊠ Yes □ No	□ >1,000	₩ No
If Yes, Enter Total Resident Population:	u.	Yes, List Bach Terrestrial Sensitive Environment:
19 People		
10. Air Pathway		
Is There a Suspected Release to Air:	Wetlands Located Within	4 Miles of the Site:
⊠ No	S Yes	
Enter Total Population on or Within:	□ No	
Onsile 3	<b></b>	
0 - 14 Mile 44	Other Sensitive Environm	cents Located Within 4 Miles of the Site:
> 4 - 4 Mile 134	E Yes	
>4-1 Mile 829	1	76 25°
>1 - 2 Miles 4547	Tim All Co.	
>2 · 3 Miles 8589	9 (7 (2) (3) (3) (4)	nments Within 14 Mile of the Site: Sensitive Environment Type/Wetlands Area (acres)
>3 · 4 Miles 55 76	Onsite	
	CINC	
Total Within 4 Miles 19721	0 - ¼ Mile	

Appendix B

# UNSCANNABLE MEDIA (PHOTOGRAPHS)

# OVERSIZED DOCUMENT

Appendix D

# FROST ASSOCIATES

88 Founders Village, Clinton, CT 06426 (860) 669-5859 FAX (860) 669-5859

September 16, 1997

To: Environmental Protection Division

205 Butler St., Floyd Towers East, Suite 1154

Atlanta, GA 30334

Attn: James Ussery

Fr: Frost Associates
P.O. Box 495
Essex, Conn 06426

Tel: (203) 767-1254 Fax: (203) 767-7069

Sub: Property of GA Housing & Finance Authority

Newman, GA

CERCLIS:

Job:

'ite Longitude: 84-49-03 84.817497 Site Latitude: 33-24-21 33.405830

The CENTRACTS report below identifies the population, households, and private water wells of each Block Group that lies within, or partially within, the 4, 3, 2, 1, .5, and .25, mile "rings" of the latitude and longitude coordinates above. CENTRACTS may have up to ten radii of any length. 1000 block groups, and 15000 block group sides.

CENTRACTS uses the 1990 Block Group population and Block Group house count data found in the Census Bureau's 1990 STF-1A files. The sources of water supply data are from the Bureau's 1990 STF-3A files. The boundary line coordinates of the Block Groups were extracted from the Census Bureau's 1990 TIGER/Line Files.

CENTRACTS reports are created with programs written by Frost Associates, P.O. Box 495, Essex, Conn. The code was written using Microsoft's Quick-Basic Ver. 4.5.

Latitude and Longitude coordinates identifying a site are entered in degrees and decimal degrees. One or more county files holding Block Group boundary lines are selected for use by CENTRACTS by determining whether the site coordinates fall within the minimum and maximum Lat\Lon coordinates of each county in the state.

Each Block Group line segment has Lat\Lon coordinates representing the "From" and "To" ends of that line. All coordinates from the selected county files are read and converted from degrees, decimal degrees to X\Y miles from the site location. Each line segment is then examined whether it lies within or partially within the maximum ring from the site.

The unique Block Group ID numbers of each line segment that lie within the maximum ring are retained. All Block Group boundary lines matching the Block Group numbers are then extracted from the respective county files to obtain all sides of the included Block Groups. Boundary records are then sorted in adjacent side order to determine the shape and area of each Block Group polygon.

Property of GA Housing & Finance Authority Newman, GA

A method to solve for the area of a polygon is to take one-half the sum of the products obtained by multiplying each X-coordinate by the difference between the adjaent Y-coordinates. For a polygon with coordinates at adjacent angles A, B, C, D, and E. The formula can be expressed:

Area =  $1/2\{Xa(Ye-Yb) + Xb(Ya-Yb) + Xc(Yb-Yd) + Xd(Yc-Ye) + Xe(Yd-Ya)\}$ 

For each ring, the selected Block Groups will be inside, outside, or intersected by the ring. When a polygon is intersected, the partial Block Group area within that inglis calculated using the method described below.

Len's ring intersects a Block Group, the intersect points are solved and plotted at the points where the ring enters and exits the shape. The chord line, a line within the circle connecting the intersect points is determined. This chord line is used to calculate the segment area, the half moon shape between the chord line and the ring, and the sub-polygon created by the chord line and the Block Group boundaries that lie outside the ring.

The segment area is subtracted from the sub-polygon area to determine the area of the sub-polygon outside the ring. The area outside the ring is then subtracted from the area of the entire polygon to arrive at the inside area. This inside area is then divided by the tract's total area to determine the percentage of area within the ring. This process is repeated for each block group that is intersected by one of the rings. The total area, partial area, and percentage of partial area of those block groups within, or partially within a ring, are held in memory for the report.

On occasion, the algorithm described above is unable to determine the area of the partial area. Within the report program is a "Paint" routine which allows an enclosed shape to be highlighted. Another routine calculates the percentage of highlighted screen pixels to the pixels within the polygon. A manual entry is allowed. Both the "paint" method and manual entry method over ride the calculated method.

CENTRACTS lists, starting on page 4, all Block Groups in State, County, Census Tract, and Block Group ID order that lie within, or partially within, the maximum ring. Each Block Group is identified by a City or Town name and by the Block Group's State, County, Tract and Block Group ID number. Following is the Block Group's 1990 populu tion and house count extracted from the Census Bureau's 1990 STF-1A files.

The next four columns display water source data from the 1990 STF-3A files. The first column is "Units with Public system or private company source of water", followed by "Units with individual well, Drilled, source of water"; "Units with individual well, Dug, source of water" and "Units with Other source of water".

For each ring, CENTRACTS then shows the Block Groups that are within that ring, the Block Group's total area in square miles, the partial area of the Block Group within that ring, and the partial percentage Within the ring. The areas of the included Block Group and the partial areas are then totaled.

The last section tallies the demographic data within each ring. The percentage of area for each Block Group is multiplied times the census data for that Block Group and totaled for all Block Group's within the ring. Ring totals are then determined by subtracting the three mile data from the four mile, the two mile from the three mile, one from the two, etc... Population on private wells is calculated using the formula: ((Drilled + Dug Wells) / Households) \* Population

_		Block	В	lk Grp	House		Drilled	Dug	Othon
No.	City	Group ID		People	Holds	Water	Wells	Wells	Other
1	Newnan	13077 1701	1	1201	464	107	241	108	15
2	Newnan	13077 1701	2	1947	693	237	339	106	12
3	Newnan	13077 1702	1	1630	548	385	137	50	0
4	Newnan	13077 1702	2	1233	465	211	205	45	0
5	Newnan	13077 1702	3	1137	431	321	60	34	9
6	Newnan	13077 1702	4	966	393	364	0	0	0
7	Newnan	13077 1702	5	773	389	363	0	0	0
8	Newnan	13077 1703	1	2260	816	277	421	140	0
9	Newnan	13077 1703	2	2079	806	423	238	111	0
10	Newnan	13077 1703	3	1778	710	601	94	24	0
11	Newnan	13077 1703	4	1991	871	861	24	0	0
12	Newnan	13077 1703	5	1732	580	611	0	0	0
13	Newnan .	13077 1706	1	1248	571	465	64	0	0
14	Newnan	13077 1706	2	657	263	271	0	0	0
15	Newnan	13077 1706	3	1319	473	509	0	0	0
16	Newnan	13077 1706	4	1270	516	420	105	0	0
17	Newnan	13077 1706	5	945	370	228	89	42	0
18	Newnan	13077 1707	1	971	344	203	94	15	0
19	Newnan	13077 1707	2	1720	562	307	219	50	10
20	Newnan	13077 1707	3	1710	602	600	7	10	0
21	Newnan	13077 1707	4	1099	493	480	0	0	0
22	Newnan	13077 1707	5	958	389	389	0	0	0
===	=======================================	222222222	==	=====	=====	=====	=====	=====	
Armen a March	Totals:			30624	11749	8633	2337	735	46

Property of GA Housing & Finance Authority Newman, GA

City	Census Tract ID		Tract People	House Count	Public Water	Drilled Wells	Dug Wells	Other Sources
	13077 1701	1	1201	464	107	241	108	15
Newnan	13077 1701	2	1947	693	237	339	106	12
Newnan	13077 1702	1	1630	548	385	137	50	0
Newnan	13077 1702	2	1233	465	211	205	45	0
Newnan	13077 1702	3	1137	431	321	60	34	9
Newnan	13077 1702	4	966	393	364	0	0	0
Newnan		5	773	389	363	0	0	0
Newnan	100,	1	2260	816	277	421	140	0
Newnan		2	2079	806	423	238	111	0
Newnan	13077 1703	3	1778	710	601	94	24	0
Newnan	13077 1703		1991	871	861	24	0	0
Newnan	13077 1703	4	1732	580	611	0	0	0
Newnan	13077 1703	5		571	465	64	0	0
Newnan	13077 1706	1	1248	263	271	0	0	0
Newnan	13077 1706	2	657	473	509	0	0	0
Newnan	13077 1706	3	1319		420	105	0	0
Newnan	13077 1706	4	1270	516	228	89	42	0
Newnan	13077 1706	5	945	370	203	94	15	0
Newnan	13077 1707	1	971	344	307	219	50	10
Newnan	13077 1707	2	1720	562	600	7	10	0
Newnan	13077 1707	3	1710	602	480	ó	0	0
Newnan	13077 1707	4		493		Ö	0	0
Newnan	13077 1707	5	958	389	389			
	Sub Totals:		30624	11749	8633	2337	735	46

For Radius of 4 Mi., Circle Area = 50.265482

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
1	Newnan	13077 17011	20.311384	3.480624	17.14
	Newnan	13077 17012	18.530357	2.920541	
	Newnan	13077 17075	0.311945	0.311945	15.76
4		13077 17022	3.655580	3.629443	100.00
5	Newnan	13077 17023	2.885892		99.29
6	Newnan	13077 17024	0.591723	2.885892	100.00
1	Newnan .	13077 17025	0.362049	0.591723	100.00
10 (0 500)	Newnan	13077 17023		0.362049	100.00
	Newnan		24.706451	6.883790	27.86
10		13077 17032	8.511662	5.137637	60.36
		13077 17033	7.597805	3.978149	52.36
	Newnan	13077 17034	8.764174	2.261705	25.81
	Newnan	13077 17035	0.747796	0.747796	100.00
	Newnan	13077 17061	4.261206	2.367617	55.56
	Newnan	13077 17062	0.293358	0.293358	100.00
	Newnan	13077 17063	0.398583	0.398583	100.00
	Newnan	13077 17064	1.750380	0.508051	29.03
17	Newnan	13077 17065	2.436228	0.545738	22.40
18	Newnan	13077 17071	1.255662	1.255662	100.00
19	Newnan	13077 17072	11.471555	2.865254	24.98
20	Newnan	13077 17073	1.294882	1.294882	100.00
21	Newnan	13077 17074	0.345086	0.345086	100.00
22	Newnan	13077 17021	7.199956	7.199956	100.00
===	=======================================	*=========	=========	=========	=====
	Totals:		127.683723	50.265476	

For Radius of 3 Mi., Circle Area = 28.274334

No.	City	Block Group ID	Total Area	Partial Area	% Within Radius
1	Newnan	13077 17011	20.311384	0.580612	2.86
2	Newnan	13077 17012	18.530357	0.560660	3.03
3	Newnan	13077 17075	0.311945	0.311945	100.00
4	Newnan	13077 17022	3.655580	1.613220	44.13
5	Newnan	13077 17023	2.885892	2.885892	100.00
6	Newnan	13077 17024	0.591723	0.591723	100.00
7	Newnan	13077 17025	0.362049	0.362049	100.00
8	Newnan	13077 17031	24.706451	3.373540	13.65
9	Newnan	13077 17032	8.511662	3.815376	44.83
10	Newnan	13077 17033	7.597805	2.271932	29.90
11	Newnan	13077 17034	8.764174	0.423023	4.83
12	Newnan	13077 17035	0.747796	0.641937	85.84
13	Newnan	13077 17061	4.261206	0.193041	4.53
14	Newnan	13077 17062	0.293358	0.236846	80.74
15	Newnan	13077 17063	0.398583	0.129666	32.53
18	Newnan	13077 17071	1.255662	1.255662	100.00
19	Newnan	13077 17072	11.471555	0.847474	7.39
20	Newnan	13077 17073	1.294882	1.217342	94.01
21	Newnan	13077 17074	0.345086	0.345086	100.00
22	Newnan	13077 17021	7.199956	6.617308	91.91
===	******	=========		=========	======

Property of GA Housing & Finance Authority Newman, GA

Totals:

123.497116 28.274334

For Radius of 2 Mi., Circle Area = 12.566371

		Block	Total	Partial.	% Within
No.	City	Group ID	Area	Area	Radius
5	Newnan	13077 17023	2.885892	2.247927	77.89
6	Newnan	13077 17024	0.591723	0.591723	100.00
7	Newnan	13077 17025	0.362049	0.361185	99.76
8	Newnan	13077 17031	24.706451	0.531512	2.15
9	Newnan	13077 17032	8.511662	2.603600	30.59
10	Newnan	13077 17033	7.597805	0.981298	12.92
18	Newnan	13077 17071	1.255662	0.432340	34.43
20	Newnan	13077 17073	1.294882	0.313931	24.24
21	Newnan	13077 17074	0.345086	0.084703	24.55
22	Newnan	13077 17021	7.199956	4.418151	61.36
===	=======================================	=========	========		======
	Totals:		54.751167	12.566370	

### For Radius of 1 Mi., Circle Area = 3.141593

		Block	Total	Partial	% Within
No.	City	Group ID	Area	Area	Radius
5	Newnan	13077 17023	2.885892	0.167404	5.80
6	Newnan	13077 17024	0.591723	0.182065	30.77
9	Newnan	13077 17032	8.511662	0.706746	8.30
22	Newnan	13077 17021	7.199956	2.085378	28.96
===	#=#========	=========	=======		=====
	Totals:		19.189232	3.141593	

### For Radius of .5 Mi., Circle Area = 0.785398

		Block	Total	Partial	% Within
No.	City	Group ID	Area	Area	Radius
9	Newnan	13077 17032	8.511662	0.046063	0.54
22	Newnan	13077 17021	7.199956	0.739335	10.27
===	~======================================		=========	RURURUEUE	=====
	Totals:		15.711617	0.785398	

### For Radius of .25 Mi., Circle Area = 0.196350

		Block	Total	Partial	% Within
No.	City	Group ID	Area	Area	Radius
		~		~	
22	Newnan	13077 17021	7.199956	0.196350	2.73
===		*========	========	ESESESES	=====
	Totals:		7.199956	0.196350	

#=#=#=#=#=	Site	Data	. ==	======	
	DICC	Duce	4		
	D			10701 5	
	Popu.	latio	on:	19721.50	,
				7556.08	
Dri	illed				
	Dug	Well	s:	329.36	5
Other Wat	er so	ource	es:	15.96	5
300					
======== Partia	(RTN	IG) o	lata	======	
rurciu	(1/11	,0, 0	laca		
Within Bing. A	Wila			N# 2 = 1 = 1	
Within Ring: 4	Mile	(S) a	ina 3	Mile(s)	
	_				
	Popul				
	House	hold	ls:	2149.48	1
Dri	lled			446.68	1
	Dug	Well	s:	119.11	
Other Wat					
			-	0.13	
** Population On Pri	wate	Wall	٠.	1467 70	î
ropulación on Fil	vale	METT		1407.79	
	500			75	
Within Ring: 3	Mile (	s) a	nd 2	Mile(s)	
	Popul	atio	n:	8589.40	
	House	hold	ls:	3212.33	
Dri				347.76	
	Dua	Well	8.	105.43	
Other Wat	or So	MCTT		3.52	
Other wat	er sc	urce	· .	3.32	
tt Damulatian on Dui				1011 77	
** Population On Pri	vate	well	s:	1211.77	
Within Ring: 2	Mile (	s) a	nd 1	Mile(s)	
	Popul	atio	n:	4547.97	
	House			1822.70	
Dri	lled			195.94	
211		Well		79.15	
Other Wat				6.49	
Other wat	er so	urce	s.	9.49	
Made — conserved to the control of t	on an arrangement of the				
** Population On Pri	vate	Well	s:	686.40	
Within Ring: 1	Mile (	s) a	nd .	Mile(s	)
0.500 April 1985 (1985) (1985) (1985) (1985) (1985)					
	Popul	atio	n:	829.28	
	House			310.93	
	lled			47.57	
		Well		19.94	
Other Wat				0.52	
Other wat	.er 50	urce	٥.	0.32	
** D			1211	100 00	
** Population On Pri	vate	well	s:	180.03	

# Property of GA Housing & Finance Authority Newman, GA

Within Ring:	.5 Mile(s)	and .25 Mile(	s)
	Populati	on: 134.18	
	Househol	ds: 45.69	
	Drilled Wel	ls: 11.62	
	Dug Wel	ls: 4.37	
Other	Water Sourc		
** Population On	Private Wel	ls: 46.96	
Within Ring	: .25 Mile(s	) and 0 Mile(s	)
	Populati	on: 44.45	
	Househol	ds: 14.94	
	Drilled Wel	ls: 3.74	
	Dug Wel	ls: 1.36	
Other	Water Sourc		
** Population On	Private Wel	ls: 15.17	

Appendix E

SITE NAME: Property of Georgia Housing & Finance Authority					
HSI NUMBI	HSI NUMBER: 10031 SITE LOCATION: Newnan, Coweta Co.				
NUMBER	DATE	DESCRIPTION OF DOCKET ITEM			
1	3/22/94	HSRA Notification			
2	6/29/94	HSI Listing Letter			
3 .	7/14/94	EPD Follow-up Letter Requesting Information in Listing Letter			
4	2/16/95	Survey of Property			
5	6/05/96	Additional Information and Request for Removal from HSI (LAW)			
6	6/25/96	HSI Database Change Form			
7	7/03/96	HSI Delisting Letter			
8	7/11/96	HSI Database Change Form			
9					
10					
		·			
ig ==					

Page \_ l \_ of \_ l



1. The information provided in this form is for:

### RELEASE NOTIFICATION/REPORTING FORM

FOR OFFICE USE ONLY

HAZARDOUS SITES RESPONSE PROGRAM
GEORGIA ENVIRONMENTAL PROTECTION DIVISION
(Please type or print legibly)



MAR 2 2 1994

Environmental Protection Div. Hazardous Waste Mgmt. Branch

2. Which of the following apply to this site? (check all that apply)

### PART I - PROPERTY INFORMATION

[]R	nitial Release Notification Reportable Quantity Release Reporting (See Con the back of this form if you check this bosinpplemental Information		[ ] Release to grou [ ] Release to soil [ ] Other releases		rded or abandone	d substa	nces, etc.
3	EPA I.D. Number (if applicable)						
4	Site or Facility Name	Proper	ty of Georgia	House	ng & Finan	co Au	thorit
5_	Site Street Address	513	e Shore Dr.				
70	Site City	Newnan		County	Coweta	ZIP	30263
7	Property Owner	Georgia	Housing & F	inance	Authority		
8	Property Owner Mailing Address		cutive Park S				
9	Property Owner City	Atlanta		State	GA	ZIP	30329
10	Property Owner Telephone No.	(404)	579-4840				
11	Site Contact Person	Joseph	Z. Luttrell	Title	Program L	oan_A	dm
12	Company Name	Georgia	Housing & F	inance			•
13	Site Contact Mailing Address	2000	utive Park S				
14	Site Contact City	Atlanta		State	GA	ZIP	30329
15	Site Contact Telephone No.	(404) 6	79-4840		N	0	
16	Facility Owner/Operator	N/A		Title			
17	Company Name						
18	Facility Owner/Operator Mailing Address						
19	Facility Owner/Operator City			State		ZIP	
20	Facility Owner/Operator Telephone No.						9276

21. SITE SUMMARY — Attach a summary (no longer than one page) that gives a general description of the property, the areas affected by the release both within and beyond the property boundaries, and any actions taken to investigate, clean up or otherwis remediate the property. In addition to the one page summary, other information concerning the property may also be attached.

JRED ATTACHMENT - Along with this form, you MUST submit original of a USGS topographical map (7:24000) with the eographic center of the site clearly marked. See the instructions for information on how to obtain an original of the map on which your site is located.

FOR OFFICE	E USE (	ONLY	***	
Quadrangle	Name:	_	 	
Latitude: Longitude:	==	<u>-</u>	 	

22. ADDITIONAL INFORMATION FOR REPORTABLE QUANTITY RELEASE REPORTING — If you checked the box for Reportable Quantity Release Reporting in Question 1 on the other side of this form, you must also attach the following information:

- A. A description of the property boundaries of this site and adjacent properties, either by legal description, survey plat, tax map, or other means.
- B. A DETAILED description of the nature and the known or estimated extent of the area contaminated, both within and beyond the site's property boundaries. Orawings or tracings on attached maps may be used.
- 23. CERTIFICATION —I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

JOSEPH Z. LUTTRELL	Program Loan Administrator	
N^*4E (Please type or print)	TITLE	
stoud 3 butters	3/22/94	
SIGNATURE	DATE	

**2**1004/006

### 21. SITE SUMMARY

To the best of Georgia Housing and Finance Authority's information, in 1986 the private owners of the residence located at 20 Lake Shore Drive, Newnan, Georgia, retained Ryder Pest Control Company to treat the premises for termites. Treatments were made from approximately March of 1986 to 1988 utilizing chlordane termiticide. Information has been received that a deriviative, heptachlor, was also used, but testing to date has not indicated reportable quantities of heptachlor. The private owner at the time has alleged that excessive quantities of the termiticide were used in treating the premises.

During May, 1988, it has been reported to the Authority that some remediation of the site was performed, including soil removal and removal and replacement of a wooden deck at the rear of the residence. Subsequently, the private owner abandoned the property, and a foreclosure resulted. GHFA acquired the property involuntarily pursuant to its loan servicing agreement subsequent to foreclosure.

Testing of the site in 1991 provided information that a high level of termiticide remained present in the foundation, soils, and interior of the dwelling. It is unknown whether or not the termiticide was applied in accordance with labelling instructions, or whether the release or present level exceeded reportable quantities.

Currently, GHFA is seeking to have a licensed environmental cleanup firm do basic cleaning of the premises and provide for disposal of any contaminated items found throught the pest control company. At the conclusion of the cleaning, comprehensive testing will be accomplished to determine the need for further remedial action. GHFA will base follow-on activities based upon the results of the preliminary clean up activity.

While the former private owner indicated exposure to himself and his family, the residence has been unoccupied and locked since they abandoned the premises.

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Page _	a manager	OT .	

### FART II - RELEASE INFORMATION

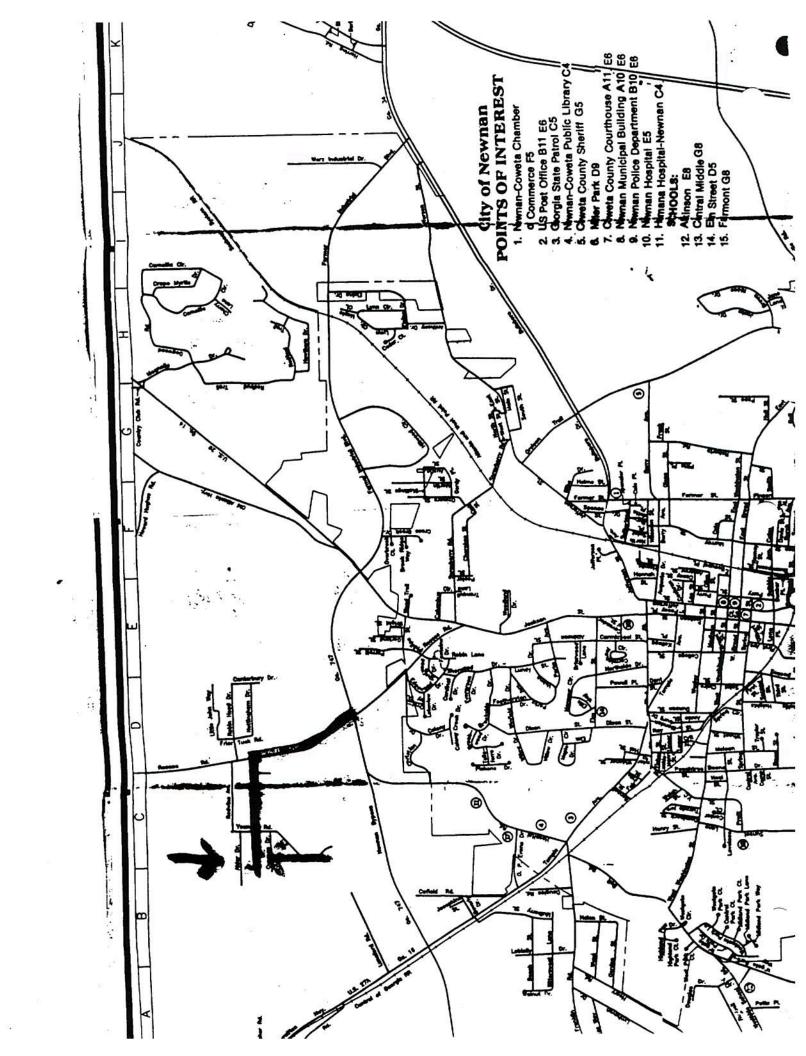
se provide the following information for EACH regulated substance release at the site. Complete a separate page for each regulated tance released.

_	
1. 0	Chemical Name (see instructions): Chlordane
	CAS Number (see instructions):57749
3. F	Physical State:
	[ ] Solid [ ] Powder/Ash [ ] Liquid/Gas/Sludge [ x] Unknown
4. (	Quantity of regulated substance released (lbs., cu. yd., etc.) Unknown
5. F	as of 12/91 Highest Known Concentration (specify units): In Soil: 36 ppm in Groundwater: <u>IInknown</u>
6. 5	Surface Area of soil affected by this release: Soil and foundation around unoccupied dwelling
7. C	Depth of this release in soil (max./min.): <u>Unknown</u>
<b>8</b> . S	Source of this release (i.e. drums, tanks, etc.): Pest Control Company Pesticide Treatment
9. F	Release Date(s): March, 1986, Same remediation performed by prior owner in May,
10	Access to the area affected by this release:
_	[ ] Inaccessible: A 24-hour surveillance system, or a completely closed barrier or fence to prevent entry. [ ] Limited Access: Less than 24-hour surveillance system, and/or a barrier or fence that is partially open. [ ] Unlimited Access: No surveillance, and no barrier or fence.
11.	What is the distance between the area affected by this release and the nearest drinking water well (including wells on the site)?
	[ ] Less than 0.5 miles [ ] 1 to 2 miles [ ] Greater than 3 miles [ ] 0.5 to 1 mile [ ] 2 to 3 miles K ] Unknown
	What is the approximate distance from the edge of the area affected by this release to the nearest residence, playground day a facility, workplace, school or other regularly occupied building or area?
	K] Less than 300 feet       [ ] 1001 to 3000 feet       [ ] Greater than 1 mile         [ ] 301 to 1000 feet       [ ] 3001 to 5280 feet       [ ] Unknown
13.	Has a human been exposed to this release?
	( ) Yes [ ] Suspected [ ] No [ ] Unknown
14.	What is the approximate thickness of the cover (if any) over the area affected by this release? <u>Unknown</u>
15.	For soil releases, what is the type of material covering this release?
1	[ ] A permanent or otherwise maintained, essentially impenetrable non-earthen material such as concrete or aspna: [ ] An engineered and maintained earthen material or compacted fill or a high density synthetic material [ ] Loose earthen fill or native soil [ ] No cover
	k! Other Foundation and structure of unoccupied dwelling.

PI

## PART II - RELEASE INFORMATIO

Pl provide the following information sull ance released.	n for EACH regulated substance	release at the site. Complete a separate page for each reg
1. Chemical Name (see instructions):	Heptachlor	
2. CAS Number (see instructions):	76448	
3. Physical State:		
[ ] Solid		\$1 \$1
[ ] Powder/Ash [ ] Liquid/Gas/Sludge [ ] Unknown		
4. Quantity of regulated substance rel	eased (lbs., cu. yd., etc.)	nknown
5. Highest Known Concentration (spec	city units): In Sail: <u>Unknow</u>	n In Groundwater: Unknown
6. Surface Area of soil affected by thi	release: Soil and Fo	undation around unoccupied dwelling
7. Depth of this release in soil (max./n	nin.): <u>Unknown</u>	
8. Source of this release (i.e. drums, t	anks, etc.): Pest Contro	1 Company Pesticide Treatment
9. Release Date(s): March, 1986 1988. ). Access to the area affected by the		n performed by prior owner in May,
[ ] Limited Access: Less than		rely closed barrier or fence to prevent entry.  nd/or a barrier or fence that is partially open.
11. What is the distance between the	area affected by this release ar	nd the nearest drinking water well (including wells on the
[ ] Less than 0.5 miles [ ] 0.5 to 1 mile	[ ] 1 to 2 miles [ ] 2 to 3 miles	[ I Greater than 3 miles XX Unknown
12. What is the approximate distance care facility, workplace, school or other		ted by this release to the nearest residence, playground, area?
{ X Less than 300 feet { } 301 to 1000 feet	[ ] 1001 to 3000 feet [ ] 3001 to 5280 feet	[ ] Greater than 1 mile [ ] Unimplies
13. Has a human been exposed to this	relesse?	
XX Yes		
[ ] Suspected [ ] No		
[ ] Unknown		
14. What is the approximate thickness	of the cover (if any) over the	rea affected by this release? Unknown
15. For soil releases, what is the type	of material covering this releas	e?
[ ] An engineered and mainta [ X Loose earthen fill or nativ [ ] No cover	iined earthen material or compa e soil	trable non-earthen material such as concrete or ascenit coted fill or a high density synthetic material unoccupied dwelling.





Governor Zell Miller

**Board of Directors** Wit B. Carson, III 14 February, 1995

Chairman

Millard Bowen Joyce B. Colborn Zack D. Cravey, Jr. Dan W. Hammack Fred Hand, Jr. Henry M. Huckaby Alan E. Pinado Carter Smyre Dorothy Towson

Governor's Designee Cynthia D. Wright

Department of Natural Resources **Environmental Protection Division** Hazardous Sites Response Program Attn: Katherine Shumake 205 Butler Street, SE Ste. 1162 Atlanta, Georgia 30334

RE: Contaminated Property GHFA # 0805814727 (b)(6) Personal Privacy

> 20 Lakeshore Drive Newnan, GA 30263 Foreclosed by GHFA: 06/05/90

Dear Ms. Shumake,

Attached please find a copy of the original survey for the above referenced property per your request to Joe Luttrell. If you need anything further, please do not hesitate to call either Joe or myself.

FEB 1 6 1995

Association of the second second

Sincerely,

Judy Freeman

Foreclosure/Default Monitor

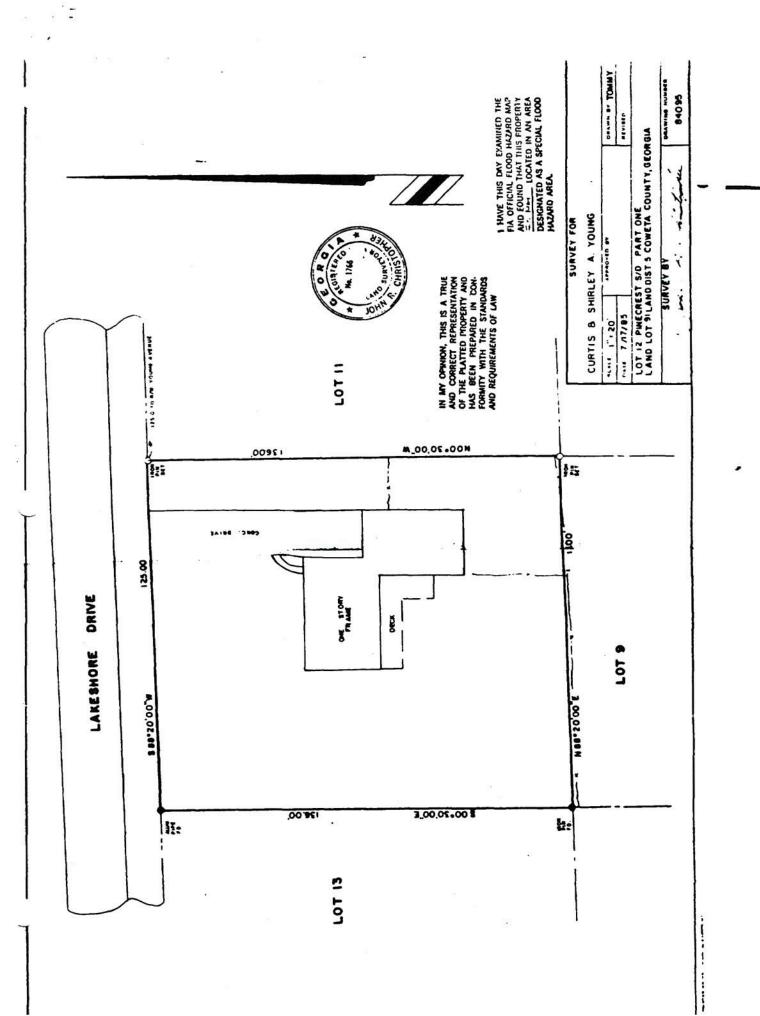
(404) 679-0653

Suite 250 60 Executive Park South, N.E. Atlanta, Georgia 30329-2231

> Phone (404) 679-4840 FAX (404) 679-4837 Toll Free Inside Georgia (800) 359-4663

> > Hearing Impaired TDD (404) 679-4915 TDD (800) 736-1155







June 5, 1996

RECEIVED

JUN 0 6 1996

Mr. Tim Cash
Georgia Department of Natural Resources
Environmental Protection Division
205 Butler Street
Atlanta, Georgia 30334-4910

HAZ. SITES RESPONSE PROG.

Subject:

Hazardous Site Inventory Site No. 10031

Property of Georgia Housing and Finance Authority

20 Lake Shore Drive Newnan, Georgia

Law Project 13220-5-5053

Dear Mr. Cash:

Law Engineering and Environmental Services, Inc. (Law), on behalf of our client, the Georgia Housing and Finance Authority (GHFA), is submitting this request to the Georgia Environmental Protection Division (EPD) to remove the subject site from the Hazardous Site Inventory (HSI) based on the requirements of Rule 391-3-19-.05 (4), "Removal of sites from the Hazardous Site Inventory." The basis of this request is that at the time of the listing the site had not had a release which either exceeded a reportable quantity or posed a danger to human health or the environment. At the time of listing the site had quantities of chlordane and heptachlor which should have resulted in an on-site pathway score of zero, therefore not exceeding a reportable quantity and not requiring listing on the HSI. The facts supporting this request are presented in the following paragraphs.

### BACKGROUND

In 1986 the house referenced above was treated several times with the termiticide chlordane. The information provided to us indicated that in March 1986 the surface of the wooden deck at the rear of the house was sprayed with chlordane. Apparently chlordane was tracked into the living areas of the house. Subsequent sampling (by others) of the interior of the house, including air samples from the living areas and basement and wipe samples of carpet and HVAC ducts indicated the presence of chlordane. Bulk samples of soils from around the house foundation walls and from the area of the deck also indicated the presence of chlordane.

In a subsequent investigation regarding the spraying of the deck, the Georgia Department 1 Agriculture found "that an employee working under [the pest control operator's] supervision made 1 pesticide application in a manner not suitable, and inconsistent with labeling restrictions to a wooden deck at the residence of (b)(6) Personal 20 Lakeshore Drive, Newnan, Georgia...."

20 Lake Shore Drive June 5, 1996

The deck was subsequently removed and replaced by the pest control operator in May 1988, and a portion of the soil beneath the deck was also removed. Confirmatory sampling of the soils during removal was not conducted. In March and April 1996, the house itself was demolished and removed to an appropriate landfill.

### HSRA/HSI ISSUES

In March 1994, based on the data available to it at that time, the GHFA notified EPD as to the possible contamination at the site under Rule 391-3-19-.04 of HSRA. Based on the information provided to EPD by the GHFA, the site was listed on the Hazardous Site Inventory on July 1, 1994.

Since that time, Law has reviewed the data collected by others and has conducted additional sampling in the vicinity of the deck. Earlier studies by others reported soil chlordane concentrations of 16,000 micrograms per kilogram (ug/kg), 24,000 ug/kg, and 36,000 ug/kg (16,24, and 36 ppm) from the east, north, and west sides of the house respectively (ETI 1991)(see Figure 1). However, the chlordane levels at these locations are consistent with residual values from a normal application, and appear to be the result of normal application of the pesticide. Therefore the residual chlordane at locations other than the deck area would fall under the exclusion from notification of Rule 391-3-19-.04(2)(f), as having been applied in a manner consistent with its label.

According to Mr. Greg Bowman of the National Pest Control Association a "rule of thumb" target residual soil concentration of chlordane in soil is 100 ppm. Mr. Bowman stated that a much lower value would be effective to control termites, but the higher value is used to assure that an adequate application of chlordane was made (personal communication). Mr. Jim Harron of the Georgia Department of Agriculture stated that when chlordane was used, the state required a soil residual value of 100 ppm (personal communication). A study by Delaplane and La Fage (1990) reported that mean residue levels sampled at 30 houses in New Orleans varied from 22 to 2540 ppm. Therefore the reported residual values of 16 ppm, 24 ppm, and 36 ppm at the house in 1991 are well within the range of residual values one would expect in soils treated to control termites.

The reported value of 140,000 ug/kg (Dunn 4/1988) at the "end of deck" was prior to the reported removal of the deck and underlying soil in May 1988. However, confirmation samples were not taken at the time of the soil removal in 1988. Subsequently, a 1991 sample taken at the "end of deck" contained chlordane at a level of only 10 ug/kg (ETI, 1991).

In September 1995, to further evaluate the actual soil concentrations in the area of the misapplication, Law collected six shallow soil samples at five locations in the area of the deck, and tested the samples for chlordane and heptachlor (a common contaminant in the pesticide chlordane) (see Figure 2). The results are presented on Table 1. All results are below the notification trigger levels of 9.2 mg/kg for chlordane and 0.66 mg/kg for heptachlor, and are also below the Type 1 risk reduction standards for residential property. Because chlordane is relatively immobile and persistent in the soil environment, we believe the September 1995 samples are reasonably representative of the conditions at the site in July 1994 at the time of the listing on the HSI.

Using the highest detected concentration of chlordane in the deck area, and assuming that drippage from the spraying of the deck would have affected no more than a foot of soil below the deck, we calculate that the total weight of chlordane in the deck area was not more than 0.011 pounds (see Appendix A for the calculations). Applying this quantity of chlordane to the scoring equation of Table 2 (of the Guidance Manual for the Reportable Quantity Screening Method dated February 10, 1994) would result in the quantity of chlordane being much less than the threshold quantity of one pound, and would result in a total pathway score of zero.

Based on the above information, we respectfully request that the Georgia EPD remove the subject site from the HSI under the provisions of Chapter 391-3-19-.05(4)(a) in that the site "had not had a release which ...exceeded a reportable quantity...at the time of listing the site on the Hazardous Site Inventory."

### SUMMARY

We believe the following items support the position that the site did not have a release which exceeded a reportable quantity at the time of listing the site on the Hazardous Site Inventory:

- Any contamination of the house itself is not a release to the environment within the meaning of the HSRA rules. Contamination of the house has been dealt with separately, and the house has been demolished and removed to an appropriate landfill.
- The soil chlordane values reported by ETI in 1991 appear to be due to normal foundation application and therefore are subject to the exclusion of Rule 391-3-19-.04(2)(d) as having been applied in a manner consistent with its label.
- Only the chlordane associated with the improper application to the deck would potentially require notification, but none of the soil samples from the deck area exceed the notification criteria. Further, based on the September 1995 soil samples and reasonable assumptions regarding the volume of affected soil, the quantity of chlordane is significantly less than the threshold quantity in Table 2 (of the Guidance Manual for the Reportable Quantity Screening Method dated February 10, 1994) therefore the total pathway score would be zero.

Based on the above we respectfully request that EPD remove the subject site from the HSI on the basis that a reportable quantity was not present at the time of the listing of the site.

If you have any questions, please call us at 770/421-3400.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL, INC.

David E. Pauls, P.E.

Principal

Larry A. Neal P.E.

Principal

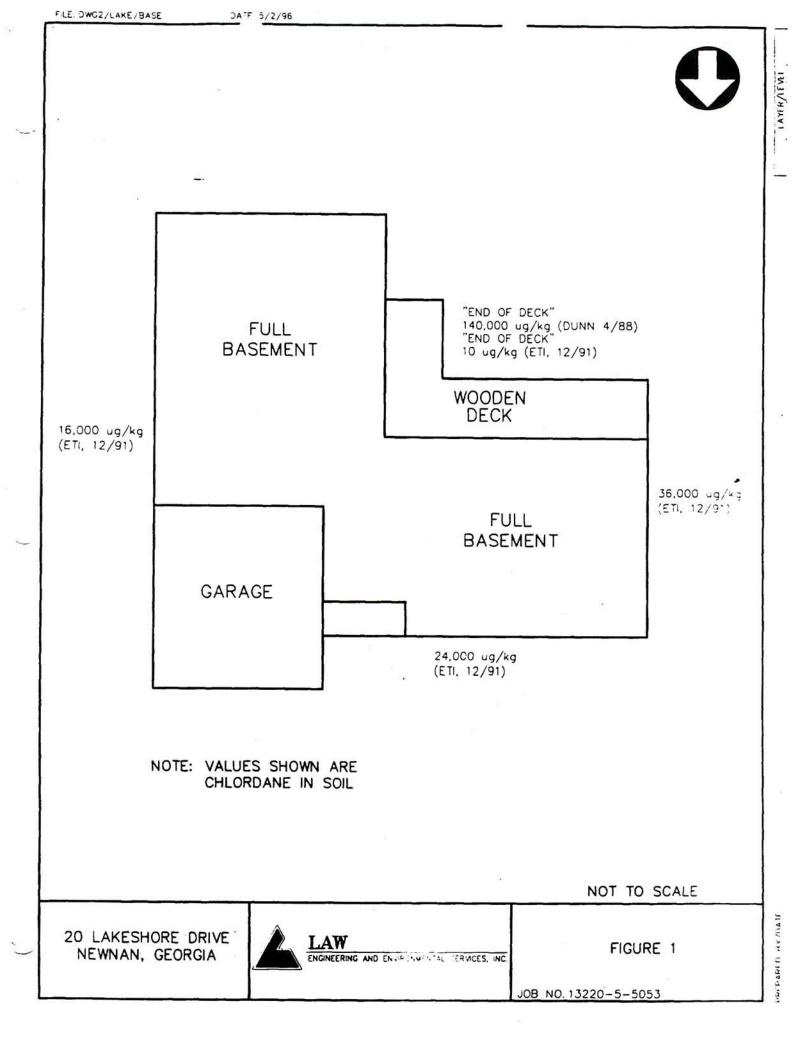
### REFERENCES

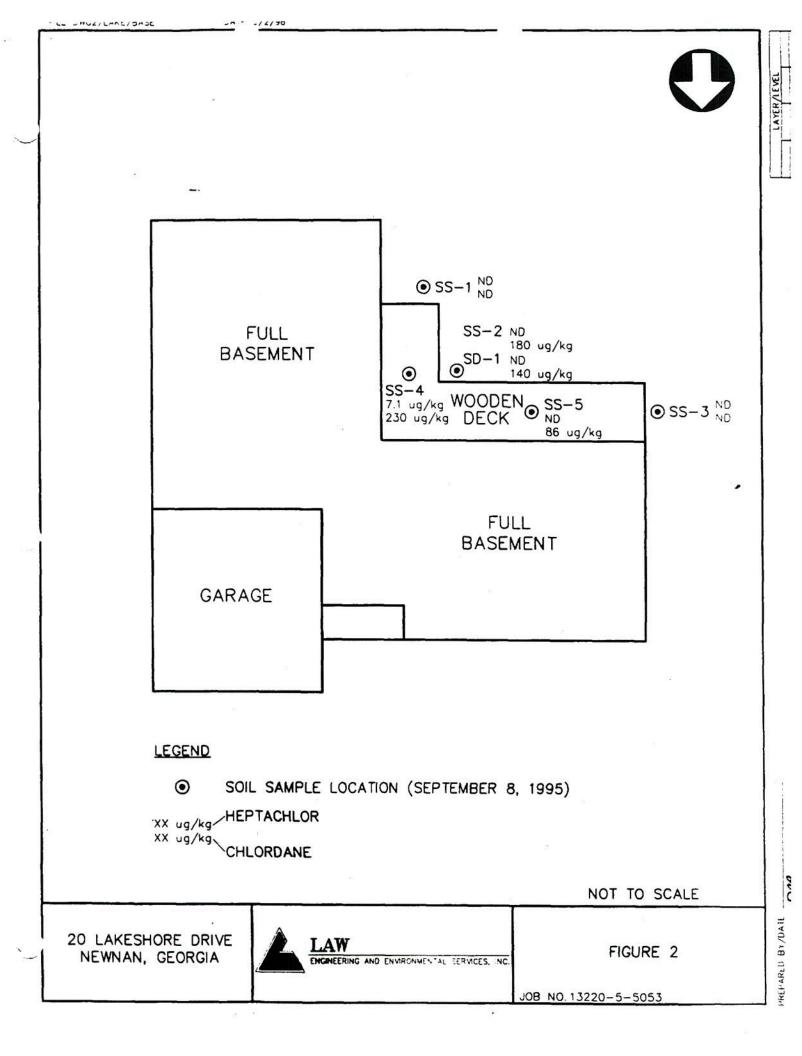
- Bowman, Greg (National Pest Control Association, personal communication), May 6, 1996.
- Delaplane, KS and La Fage, JP 1990. Variable chlordane residues in soil surrounding house foundations in Louisiana, USA. Bull Environ Contam Toxicol 45:675-680. (as referenced in U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, draft Toxicological Profile for Chlordane, October 1992.)
- Department of Agriculture, State of Georgia, in the matter of: James Rider, Rider Pest Control,
   128 Jefferson Street, Newnan, Georgia 30263, <u>ORDER OF THE COMMISSIONER</u>, November
   18, 1987.
- Dunn Laboratories, RE: Soil Samples Received April 21, 1988, Chlordane Analysis, May 20, 1988.
- Environmental Toxicology International, Inc. (ETI), RE: Curtis and Shirley Young v. Ryder Pest Control, February 17, 1992.
- Harron, James (Georgia Department of Agriculture, personal communication), May 8, 1996.
- Law Engineering, Subject: Peer Review of Termiticide Sampling Reports, 20 Lake Shore Drive
   & 28 Garden Street, Newnan, Georgia, Law Associates Project No. 11922328.00, December 14,
   1992.

TABLE 1 20 Lakeshore Drive, Newnan, Georgia Project No. # 13220-5-5053

Sample ID	Sample, Depth, Inches	Heptachlor μg/kg (DL)	Chlordane μg/kg (DL)
SS-1	6-12	ND (5.0)	ND (50)
SS-2	6-12	ND (5.0)	180 (50)
SS-3	6-12	ND (5.0)	ND (50)
SS-4	6-12	7.1 (5.0)	230 (50)
SS-5	6-12	ND (5.0)	86 (50)
SD-1	6-12	ND (5.0)	140 (50)

SD-1 is duplicate of SS-2





Appendix A

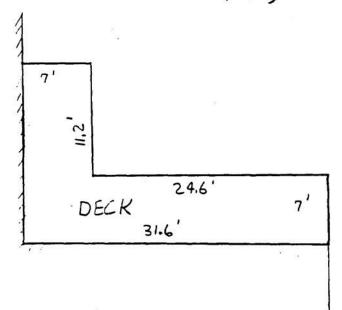
Calculations

20 Lakeshore Drive Newman, GA Law Job # 13220-5-5053

HOULE

by: D & Pauls
3/29/96

Estimate potential quantity of chlordane which may be in the soil on a result of spraying the dark



Calculate area of deck plus 3-feet beyond on the yard side  $A = (7+3)(11.2') + (31,6+3)(7+3) = 112 + 346 = 458 ft^2$ 

If affected soil is 1' thick, then volume is 458 ft 3 Using soil at 100 #ft3; 458 ft3 x 100 #ft3 = 45,800 # soil Using highest measured chlordane concentration (230µg/kg or 230 Weight of chlordane = 45,800 # x 230 x10-9 = 0.0105#

# Appendix B

Laboratory Data



September 21, 1995

Gerald Muller
Law Engineering and Environmental Services, Inc.
112 TownPark Drive
Kennesaw, GA 30144

Subject:

Chemical analysis of samples received on 09/08/95

Project Number: 13220-5-5053

Dear Mr. Muller:

Law Environmental National Laboratories has completed its analysis of your samples and reports the results on the following pages. These results relate only to the contents of the samples as submitted. This report shall not be reproduced except in full without the approval of Law Environmental National Laboratories.

If there are any questions, please do not hesitate to contact Rhonda K. Arnwine at (404)-421-3306

Sincerely.

LAW ENVIRONMENTAL NATIONAL LABORATORIES

W. Paul Brafford

Laboratory Manager

WPB:pah

Enclosures:

Data Report

Invoice

LAW ENVIRONMENTAL, INC. NATIONAL LABORATORIES

112 TOWN PARK DRIVE • KENNESAW. GA 30144 (404) 421-3400 • FAX (404) 421-3486

Date 09/21/95

Page 1

--- Project Information ---

Lab Number : 95-2406-01

Project No.: 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SS-1

Matrix : SO

Sampled Date/Time : 09/08/95 09:30 Received Date/Time : 09/08/95 13:15

Type : GRAB Collector : GRM

Received From/By : GM/JA Chain of Custody : 32738 Number of Containers : 1

Method	Units	DL	Results	Test Date	Analy
D2216 M	8	1.0	13	09/20/95	RH
3550/8080			N/A	09/19/95	SCC
EPA 3620				[10]	SCC
EPA 3660			N/A		SCC
EPA 8080	ug/kg	5.0	ND	09/20/95	BT
EPA 8080	ug/kg	50	ND	09/20/95	BT
	D2216 M  3550/8080 EPA 3620 EPA 3660  EPA 8080	D2216 M %  3550/8080  EPA 3620  EPA 3660  EPA 8080 ug/kg	D2216 M % 1.0  3550/8080 EPA 3620 EPA 3660  EPA 8080 ug/kg 5.0	D2216 M % 1.0 13  3550/8080 N/A EPA 3620 N/A EPA 3660 N/A  EPA 8080 ug/kg 5.0 ND	3550/8080 N/A 09/19/95 EPA 3620 N/A 09/19/95 EPA 3660 N/A 09/19/95  EPA 8080 ug/kg 5.0 ND 09/20/95

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry we. ...

Signed

C7/mc En

Date 09/21/95 Page 1

--- Project Information ---

Lab Number: 95-2406-02

Project No.: 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SS-2

Sampled Date/Time : 09/08/95 09:45

Matrix : SO

Received Date/Time : 09/08/95 13:15

Type : GRAB Collector : GRM

Received From/By : GM/JA

Chain of Custody: 32738

Number of Containers: 1

Parameter..... Results... Test Date Analy -- INORGANIC CHEMISTRY RESULTS --D2216 M % Moisture (Oven Dried @ 105C) 1.0 12 09/20/95 RH -- ORGANIC PREP RESULTS --3550/8080 Ext/Pest-SO/Son N/A 09/19/95 SCC Florisil Cleanup EPA 3620 N/A 09/19/95 SCC Sulfur Cleanup (with Copper) EPA 3660 N/A 09/19/95 SCC -- GC ORGANIC ANALYSIS (SO) RESULTS --EPA 8080 ND Heotachlor ug/kg 5.0 09/20/95 BT ordane EPA 8080 ug/kg 50 180 09/20/95 BT

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry weight.

Signed Am Bank

Date 09/21/95

Page 1

--- Project Information ---

Lab Number : 95-2406-03

Project No. : 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SS-3

Matrix : SO

Sampled Date/Time : 09/08/95 10:00

Type : GRAB

Received Date/Time : 09/08/95 13:15

Collector : GRM

Received From/By : GM/JA Chain of Custody : 32738

Number of Containers: 1

Parameter	Method	Units	DL	Results	Test Date	Anal
INORGANIC CHEMISTRY RESULTS						
Moisture (Oven Dried @ 105C)	D2216 M	8	1.0	15	09/20/95	RH
ORGANIC PREP RESULTS						
Ext/Pest-SO/Son	3550/8080			N/A	09/19/95	SCC
Florisil Cleanup	EPA 3620			N/A		SCC
Sulfur Cleanup (with Copper)	EPA 3660			N/A	09/19/95	
GC ORGANIC ANALYSIS (SO) RESULTS						
Fontachlor	EPA 8080	ug/kg	5.0	ND	09/20/95	BT
ordane	EPA 8080	ug/kg	50	ND	09/20/95	BT

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry weight.

Signed 27/mcB-

Date 09/21/95 Page 1

--- Project Information ---

Lab Number : 95-2406-04

Project No. : 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SS-4

Sampled Date/Time : 09/08/95 10:30

Matrix : SO

Received Date/Time : 09/08/95 13:15

Type : GRAB

Received From/By : GM/JA

Collector : GRM

Chain of Custody: 32738 Number of Containers : 1

Parameter	Method	Units	DL	Results	Test Date	Analy
INORGANIC CHEMISTRY RESULTS						
Moisture (Oven Dried @ 105C)	D2216 M	8	1.0	11	09/20/95	RH
ORGANIC PREP RESULTS						
Ext/Pest-SO/Son	3550/8080			N/A	09/19/95	SCC
Florisil Cleanup	EPA 3620		10.00	N/A	09/19/95	SCC
Sulfur Cleanup (with Copper)	EPA 3660			N/A	09/19/95 -	SCC
GC ORGANIC ANALYSIS (SO) RESULTS		200				
' tachlor	EPA 8080	ug/kg	5.0	7.1	09/20 :=	3T
ordane	EPA 8080	ug/kg	50	230	09/20 -	3 <b>T</b>

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry --

CHMIBE.

Date 09/21/95

Page 1

--- Project Information ---

Lab Number : 95-2406-05

Project No.: 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SS-5

Sampled Date/Time : 09/08/95 11:00

Matrix : SO

Received Date/Time : 09/08/95 13:15

Type : GRAB Collector : GRM

Received From/By : GM/JA Chain of Custody: 32738

Number of Containers :

Parameter	Method	Units	DL	Results	Test Date	Analy
INORGANIC CHEMISTRY RESULTS Moisture (Oven Dried @ 105C)	D2216 M	8	1.0	8.0	09/20/95	RH
ORGANIC PREP RESULTS Ext/Pest-SO/Son Florisil Cleanup Sulfur Cleanup (with Copper)	3550/8080 EPA 3620 EPA 3660		×	N/A N/A N/A	09/19/95 09/19/95 09/19/95	SCC SCC SCC
GC ORGANIC ANALYSIS (SO) RESULTS F tachlor C ordane	EPA 8080 EPA 8080	ug/kg ug/kg	5.0 50	ND 86	09/20/95 09/20/95	BT BT

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry we :: ::

Signed C7/mc Rive

Date 09/21/95 Page 1

--- Project Information ---

Lab Number : 95-2406-06 Project No. : 13220-5-5053

Cust. No. :

Project Name : GEORGIA HFA

Manager: GERALD MUELLER

--- Sample Information ---

Station ID : SD-1

Sampled Date/Time : 09/08/95 11:30

Matrix : SO

Received Date/Time : 09/08/95 13:15

Type : GRAB

Received From/By : GM/JA

Collector : GRM

Chain of Custody: 32738
Number of Containers: 1

Parameter..... Results... Test Date Analy -- INORGANIC CHEMISTRY RESULTS --Moisture (Oven Dried @ 105C) D2216 M 1.0 14 09/20/95 RH -- ORGANIC PREP RESULTS --Ext/Pest-SO/Son 3550/8080 N/A 09/19/95 SCC Florisil Cleanup EPA 3620 09/19/95 SCC N/A Sulfur Cleanup (with Copper) EPA 3660 N/A 09/19/95, SCC -- GC ORGANIC ANALYSIS (SO) RESULTS -ntachlor EPA 8080 ug/kg 5.0 ND 09/20/95 BT .ordane EPA 8080 ug/kg 50 140 09/20/95 BT

Remarks:

DL = Detection Limit ND = Not Detected at the DL Unless otherwise noted, all soil test results are calculated based on dry we.

Signed

CH mc Buch

NATIONAL LABORATORY 112 TOWNPARK DRIVE KENNESAW, GEORGIA 30144 (404) 421-3389 LAW ENVIRONMENTAL, INC.

CHAIN OF JSTODY RECORD

95-34

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REMARKS

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WATER W

UTHER GA

## Georgia Departme of Natural Resources

205 Butler Street, SE, Suite 1462, Atlanta, Georgia 30334

Lonice C. Berrett, Commissioner Environmental Protection Division Harold F. Rehels, Director 404/857-8600

# FILE COPY

July 3, 1996

Mr. Joseph Luttrell
Program Loan Administrator
Georgia Housing & Finance Authority
60 Executive Park South, Suite 250
Atlanta, Georgia 30329

RE:

HSI # 10031

Property of Georgia Housing & Finance Authority 20 Lake Shore Drive, Newnan, Georgia

Dear Mr. Luttrell:

In 1994, the Environmental Protection Division (EPD) evaluated the above referenced site to determine whether a release exceeding a reportable quantity had occurred. Based upon the information available to EPD at the time this evaluation was done, specifically your notification dated March 22, 1994, it was determined that a release exceeding a reportable quantity had occurred at this site. Therefore, the site was listed on the Hazardous Site Inventory (HSI) on June 29, 1994.

In EPD's initial review of the site, there were areas around the residential structure, specifically the wooden deck and soils beneath it, believed to be contaminated sufficiently to constitute a notifiable release. The notification indicated this was an area where the pesticide, chlordane, was applied in a manner contrary to its labeling. Although removal of the wooden deck and some soils beneath it were reported to have been completed in 1988 prior to the site's listing, sampling of the remaining soil was not conducted and EPD was unable to determine conclusively that a notifiable condition did not exist. Consequently, the notification was scored and the site was then listed on the HSI as noted previously.

After reviewing Law Engineering and Environmental Services, Inc.'s letter dated June 5, 1996, EPD has reason to believe that the original release was not subject to the release notification requirements at Section 391-3-19-.04 of the Rules for Hazardous Site Response at the time of the site's listing on the HSI. The concentrations of chlordane detected in soil immediately adjacent to the foundation walls (16-36 mg/kg), although greater than the notification concentration of 9.2 mg/kg, are commensurate with residual levels expected from the application of this termiticide in a manner consistent with its labeling. Therefore, the presence of the termiticide in the foundation wall soils is a release which "consists solely of the use of said pesticide in a manner consistent with its label or labeling" and is consequently excluded from release notification due to Rule 391-3-19-.04(2)(f). Currently, concentrations of chlordane in soils beneath the former deck area are considerably lower (maximum of 0.230 mg/kg) than those in foundation wall soils. Given chlordane's half-life in the environment, the concentrations in the deck area soils that existed at the time of the site's listing were most likely over an order of magnitude less than the notification concentration. Therefore, EPD concurs that the release of chlordane to the soils beneath the deck does not meet the criterion for notification at Rule 391-3-19-.04(3)(b). The same conclusions can be supported for heptachlor, a substance which is associated with the chlordane.

Mr. Joseph Luttrell July 3, 1996 Page 2

In conclusion, the release at the site did not exceed a reportable quantity at the time of listing on the HSI; consequently, the site shall be removed from the HSI pursuant to Rule 391-3-19-.05(4)(a).

Attached to this letter is a summary for the site of information stored in the HSI database, which has been revised to reflect this most recent determination. You will notice that the site's pathway scores using the Reportable Quantities Screening Method no longer exceed the threshold score of 10 for the groundwater pathway, or 20 for the on-site pathway. Our determination that a reportable quantity had not been released immediately follows from these subthreshold scores. Because neither a reportable quantity was exceeded nor has the Director determined that the site posed a danger to human health or the environment at the time of listing on the HSI, the site is hereby removed from the HSI as of the date of this letter. In the July 1997 publication of the HSI, the site will be listed under "Sites Removed From the HSI"; thereafter, subsequent publications of the HSI will not mention your site.

EPD is not required to provide notice to the public of the removal of a site from the HSI when that removal is made pursuant to Rule 391-3-19-.05(4)(a). If you wish to provide such notice, you are not restrained from doing so by the Hazardous Site Response Act, or Rules promulgated pursuant thereto. However, if the language of your planned public notice includes interpretation of the site removal that implies that EPD would concur with that interpretation, I would ask that you allow EPD the opportunity to review and comment on such language prior to publication.

If you have any questions, please call David Brownlee of EPD's Hazardous Sites Response Program at (404) 657-8600.

Sincerely.

Jennifer & Kaduck

Chief

Hazardous Waste Management Branch

c:

David E. Pauls

File:

HSI 10031

R:VDAVIDBYLETTERSYLUTTRELLL01

Site No .: 10031 Site Name: Property of Georgia Housing & Finance Authority 06/25/96 12:52:32 20 Lake Shore Drive Location: Newnan Lat 33° 24 ' 21 " N Lon 84 ° 49 Coweta 30263 County: Georgia Housing & Finance Authority Property Owner: 60 Executive Park South, Suite 250 Atlanta ,GA 30329 Phone: (404) 679-4840 Joseph Z. Luttrell Contact Person: Program Loan Adm Georgia Housing & Finance Authority 60 Executive Park South, Suite 250 **ATlanta** , GA 30329 Phone: (404) 679-4840 Facility ow/op: NA Phone: EPA ID: Entered HSI Database on: 04/27/94 Corrective Action Site Class: **OUTPUT FROM REPORTABLE QUANTITIES SCREENING METHOD GROUNDWATER PATHWAY** Pathway Score: 0.00 A. Known (45), Suspected (10), or Pot. Future (5): 0 1B.Higher (6), Average (3), or Lower (0) Susceptibility: 0 2B. Physical State [ stable solid=0; liquid=3]: C. Containment [ very good=0; poor=3]: SUBSTANCE: (CAS: 57749 ) Chlordane 3D. Quantity: 2D. Toxicity: 0 0 - N/A - No Release 1E. Exposure: 0 (If 1E>4 then 2E=16) (If 1E=0 then 2E=1) 2E. Distance to well or spring: 0 ON-SITE EXPOSURE PATHWAY 0.00 Pathway Score: A. Access [ none=0; unlimited=4]: 4 B. Known (25), suspected (15), or no known (0) release: 0 C. Quality of containment [ very good=0; poor=5]: 2 SUBSTANCE: (CAS: 57749) Chlordane 2D. Toxicity: 16 3D. Quantity: 1 - due to origin of contaminants, believe quantity to be very small 1E. Distance to resident [<300'=8; >1mile=1]: 2E. Sensitive Environment affected [yes=1]: 0 OTHER SUBSTANCES: Gmdwat Soil Substance

Heptachlor

# Georgia Department of Natural Resources

205 Butler Street, SE, Suite 1462, Atlanta, Georgia 30334 Lonice C. Barrett, Commissioner

FILE COPY

Lonice C. Barrett, Commissioner Environmental Protection Division Harold F. Reheis, Director 404/657-8600

August 28, 1996

Mr. Joseph Luttrell
Program Loan Administrator
Georgia Housing & Finance Authority
60 Executive Park South, Suite 250
Atlanta, Georgia 30329

RE:

HSI # 10031

Property of Georgia Housing & Finance Authority

20 Lake Shore Drive, Newnan, Georgia

Dear Mr. Luttrell:

As indicated in our delisting letter of July 3, 1996, we have asked to be allowed to review and comment on the language of any proposed publication or statement regarding the delisting of this site. To that end, we have received your correspondence dated August 1, 1996 that includes the draft of the disclosure statement you intend to attach to future transactions regarding the site. After reviewing the statement, we concur with the appropriateness of the statement and have no further comments or exceptions to add to it. Thank you for your cooperation in this matter.

If you have any questions, please call David Brownlee of EPD's Hazardous Sites Response Program at (404) 657-8600.

Sincerely,

Tim Cash

Program Manager

Hazardous Site Response Program

c:

David E. Pauls

File:

HSI 10031

R:\DAVIDB\LETTERS\LUTTRELL.L02



# Georgia Housing & Finance Authority

Programs Administered by The Georgia Department of Community Affairs

Jim Higdon
EXECUTIVE DIRECTOR

Zell Miller GOVERNOR

August 1, 1996

6

Jennifer R. Kaduck Chief Hazardous Waste Management Branch Georgia Department of Natural Resources 205 Butler Street, SE Suite 1462 Atlanta, Georgia 30334

Subject::

HSI #10031

Site: 20 Lake Shore Dr., Newnan, GA

Dear Ms. Kaduck:

Enclosed is a draft of our proposed disclosure statement for the subject property. This statement will be attached as an addendum to the listing agreement, sales contract and, upon eventual transfer of the property, will be recorded along with the conveyance deed. We would like for your office to review and comment on the disclosure statement beforehand.

Please call me at (404) 679-0654 if you have any questions.

Respectfully,

J. Z. Luttrell, Loan Administrator

- stutte

c: David Pauls/LAW





Ms. Tonya Curry August 1, 1996 Page --2--

# NOTICE TO PROSPECTIVE PURCHASERS OF UNIMPROVED PROPERTY LOCATED AT 20 LAKESHORE DRIVE, NEWNAN, GEORGIA PRESENTLY OWNED BY THE GEORGIA HOUSING AND FINANCE AUTHORITY

The Georgia Housing and Finance Authority (GHFA) obtained title to the above property through foreclosure. In early 1994, GHFA had reason to believe that the property may have been contaminated by an overapplication of pesticide for the control of termites, more specifically chlordane and heptachlor. On March 22, 1994, GHFA submitted the property to the Environmental Protection Division, Department of Natural Resources, pursuant to the Georgia Hazardous Site Response Act and EPD Rule 391-3-19-.04. While the wooden deck and surrounding soil where the overapplication had occurred had been removed from the property prior to GHFA obtaining title, no new testing had been done. Accordingly, on June 29, 1994, the property was listed on the Hazardous Site Inventory as HSI #10031.

In May, 1996, because the property had been vacant for several years and remediation and repair costs to the structure were not economically feasible, the house was demolished, removed from the property, and the site regraded. New samples of the soils on the site were thoroughly tested and the results submitted to EPD in June, 1996. GHFA requested the property be removed from the Hazardous Site Listing since the evidence indicated that at the time of the listing, the property may not have contained chlordane or heptachlor in reportable quantities.

On July 3, 1996, EPD removed the property from the Hazardous Site Inventory, and stated in part as follows:

"Therefore, EPD concurs that the release of chlordane to the soil beneath the deck does not meet the criteria for notification at Rule 391-3-19--4(3)(b)....

"Because neither a reportable quantity was exceeded nor has the Director determined that the site posed a danger to human health or the environment at the time of listing on the HSI, the site is hereby removed from the HSI as of the date of this letter."

The complete file regarding this property is available for inspection at the office of the Environmental Protection Division in Atlanta, Georgia.

### Georgia Department of Natural Resources

205 Butler St. S.E., Floyd Towers, East, Suite 1462, Atlanta, Georgia 30334

FILE COPY

Lonice C. Barrett, Commissioner Environmental Protection Division Harold F. Reheis, Director Hazardous Waste Management Branch 404/657-8600

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

September 6, 1996

Deborah P. Glover Clerk of Superior Court P.O. Box 943 Newman, Georgia 30264-0943

RE:

Removal of Site from Hazardous Site Inventory Georgia Housing & Finance Authority - HSI # 10031

Dear Ms. Glover:

On July 1, 1996, the Georgia Environmental Protection Division (EPD) published the third edition of the Georgia Hazardous Site Inventory (HSI). Pursuant to O.C.G.A 12-8-97(a), EPD sent you a copy of the HSI for filing in the room where deed records are kept. The purpose of this correspondence is to update that July 1, 1996 edition of the HSI.

You will find one or more documents attached to this correspondence. These documents are summary sheets for sites EPD has removed from the HSI since July 1, 1996 and which lie within your county.

Please insert this letter and the attachments in the section labeled "UPDATES" in your copy of the HSI. If you have multiple HSI booklets, please photocopy this correspondence and attach a copy to each HSI.

If there are any questions, or if you do not have a copy of the July 1, 1996 Hazardous Site Inventory, please call me at (404)657-8600.

Sincerely,

Legal Assistant

Hazardous Sites Response Program

att: Site summary sheet

file: HSI # 10031

#### SITE SUMMARY

#### HSI # 10031 - Property of Georgia Housing & Finance Authority

The reportable release at the site, an abandoned residence in Newnan, consisted of chlordane contamination in the foundation, soils, and interior. The Authority has information indicating that Ryder Pest Control Company treated the premises for termites from approximately March 1986 to 1988 using chlordane and possibly heptachlor as a termiticide. The owner of the residence at the time alleged that excessive amounts of the termiticide had been used in areas not proper for the application of termiticide. In May 1988, some remediation was performed, including soil removal and replacement of a wooden deck behind the house. The owner subsequently abandoned the property and GHFA acquired the property through foreclosure. Sampling at the site in 1991 indicated that chlordane contamination remained although the areas of inappropriate application were not resampled. GHFA submitted a HSRA notification in March 1994 and the site was listed on June 29, 1994.

Subsequent sampling conducted by LAW Engineering for GHFA revealed that contamination was actually below the NC levels for chlordane and heptachlor in the inappropriate application areas at the time of listing. Therefore, the site was delisted on July 3, 1996 pursuant to Rule § 391-3-19-.05(4)(a). The areas with levels of chlordane above the NC level meet the criteria of Rule § 391-3-19-.04(2)(f) and therefore is not subject to reporting requirements.

R:\DAVIDB\DOCKETS\10031.SUM

August 13, 1996

Appendix F

# Georgia Department of Natural Resources

205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

#### RECORD OF TELEPHONIC CONVERSATION

Routing:	Date: Time:	9/22/97 1:17 p.m.
Party Spoken To: Mr. David Sibley Agency/Company: Newman Water & Light	Title:	Watershed Superintendent
Address: 70 Sewell Road Telephone Number: (770)253-5516	City: State/Zi	Newnan
Subject(File Name): Property of Georgia H	tousing & F	inance Authority
Summary of Call:  Mr. Sibley informed me that there the City of Newman These intakes are loss sandy Creek and Line Creek. The Newman 2~3 million gallons per day from the White point located Near Big Popular Road. The of winter months. The Newman Waterworks La are used to store water.	sted on: W Water & Light Oak Creek ther intakes	nite Oak Creek, to removes approximately surface water intake are used only in the
Action Required: None		
Follow-up Responses/Additional Comments:		
Signature: James D. Shurman	Date:	9/22/97

(0918R)

# Georgia Department of Natural Resources

205 Butler Street, S.E., Suite 1252, Atlanta, Georgia 30334

Joe D. Tanner, Commissioner
Harold F. Reheis, Director
Environmental Protection Division

#### RECORD OF TELEPHONIC CONVERSATION

Routing:		Date: Time:	9/22/97 2:30 pm.
8			
File: <u>GHFA</u>	(Newnan)		
Agency/Co	0: Mr. Dudley Buchanan mpany: Newman Water & Light P.O. Box 578 Number: (770) 251 - 0994	Title: City: State/Z	Newnan ip: GA 30264
Subject(File N		Howing & Finance	
the City of N Popular Road, 54 at the coun access to city Nas a water di water flow a water lines, b the did not know Creek or pond 371 acres and 5	chanan informed me that ewnan. These intakes are los Sandy Creek near Corty line. He estimated that water. Small communities may ischarge point on Wahoo Cot this point is 0.76 % and Newnan Water & Light with Newnan Water & Light with I have the drainage flow above the water discharge. I above the water discharge. I cfs. respectively. He also take on White Oak Creek is of	ated on: White O inth Road, and Is % of the papulati be using private we reck within the co Coweta County ou to provides the wat snake Creek, Wa area below water point is 4,338 acre told me that the ave	ak Creek near Big Line Creek nea Highway ion of Coweta County has ells. The City of Newman ty Limits. The average who the pumps and ree to the community. Those Creek, Little Walton discharge point is as This calculates to
Follow-up Resp	onses/Additional Comment	s:	
Signature: 9	amo D. Divindi	Date:	9/22/97

(0918R)

Appendix G

# SOIL SURVEY OF COWETA, HEARD, AND TROUP COUNTIES, GEORGIA

By Jule F. Brooks, Soil Conservation Service

Soils surveyed by Jule F. Brooks, Thomas N. Crabb, and Robert D. Wells, Soil Conservation Service

U. S. Department of Agriculture. Soil Conservation Service.
in cooperation with the University of Georgia, College of Agriculture,
Agricultural Experiment Stations

COWETA, HEARD, AND TROUP COUNTIES are in the west-central part of Georgia (See opposite page). The survey covers a land area of 738,752 acres, or 1,154 square miles. Coweta County has 283,072 acres, or 442 square miles. Heard County has 190,080 acres, or 297 square miles. Troup County has 265,600 acres, or 415 square miles.

Coweta, Heard, and Troup Counties are in the Southern Piedmont Major Land Resource Area. Heard and Troup Counties and the western part of Coweta County are in the Chatahoochee River watershed. The Chattahoochee River is the northwestern boundary of Coweta County. It flows mostly southwesterly through Heard County into Lake West Point. This lake occupies most of the Chattahoochee River flood plain in extreme southern Heard County and in Troup County. From the lake, the Chattahoochee River flows south to Harris County. The eastern part of Coweta County is in the Flint River watershed. The eastern boundary of Coweta County is Line Creek.

The landscape consists of ridgetops and hillsides that are dissected by numerous drainageways. The survey area is characterized mostly by very gently sloping to sloping ridgetops on uplands. The hillsides near the major streams, however, are strongly sloping or steep. Narrow to wide, nearly level flood plains are throughout the survey area and are commonly adjacent to steep hillsides. Elevation of the uplands ranges from about 800 feet in the southern part of Coweta and Troup Counties to about 1,400 feet in the northwestern part of Heard County.

#### General nature of the counties

Ervin P. Rayfield, planning director, Chattahoochee-Flint Area Planning and Development Commission, assisted in preparing this section.

This section gives general information about the counties concerning their climate; organization, settlement, and population; industry; natural resources; and farming.

#### Climate

This subsection was prepared by the National Climatic Center, Asheville, North Carolina.

Coweta, Heard, and Troup Counties have long, hot summers because moist tropical air from the Gulf of Mexico persistently covers the area. Winters are cool and fairly short. They are interrupted only rarely by a cold wave, which moderates in 1 or 2 days. Precipitation is fairly heavy throughout the year, but reaches a slight peak in winter. Prolonged droughts are rare. Summer precipitation, mainly afternoon thundershowers, is adequate for all crops.

Table 1 gives data on temperature and precipitation for the survey area, as recorded at Newnan, Georgia, for the period 1951 to 1975. Table 2 shows probable dates of the first freeze in fall and the last freeze in spring. Table 3 provides data on length of the growing season.

In winter the average temperature is 46 degrees F, and the average daily minimum is 35 degrees. The lowest temperature on record, minus 3 degrees, occurred at Newnan on January 24, 1963. In summer the average temperature is 78 degrees, and the average daily maximum is 89 degrees. The highest temperature, 104 degrees, was recorded on July 23, 1952.

Growing degree days, shown in Table 1, are equivalent to "heat units". (See footnote 1 of Table 1 for a definition of growing degree day.) Beginning in spring, growing degree days accumulate by the amount that the average daily temperature exceeds a base temperature (50 degrees F). The normal monthly accumulation is used to schedule single or successive plantings of a crop between the last freeze in spring and the first freeze in fall.

Of the total annual precipitation, 26 inches, or 50 percent, generally falls during April through September, which includes the growing season for most crops. In 2 years out of 10, the April to September rainfall is less than 22 inches. The heaviest 1-day rainfall during the period of record was 5.30 inches at Newnan on February 25, 1961.

TABLE 1 .-- TEMPERATURE AND PRECIPITATION DATA

	Ì		T	emperature <sup>1</sup>			}	P	recipit	ation <sup>1</sup>	
a Victoria de la Constancia de la Consta				10 wil	ars in l have	Average		will	s in 10 have	Average	
Month	daily maximum	Average daily minimum	1	Maximum	Minimum temperature lower than	number of growing degree days <sup>2</sup>	Average	Less	More than	number of days with 0.10 inch or more	snowfa
	Ē	Ē	<u>F</u>	<u>F</u>	E	Units	<u>In</u>	<u>In</u>	In		<u>In</u>
January	55.3	33.9	44.7	74	8	61	5.19	3.25	6.94	9	
February	59.2	35.6	47.4	78	11	87	4.84	3.00	6.50	7	
March	66.6	41.5	54.1	85	20	194	5.70	3.77	7.46	9	
April	76.3	50.0	63.2	89	31	396	4.94	3.06	6.62	6	
Мау	82.8	57.6	70.2	94	39	626	4.24	2.09	5.98	6	
Jun e	87.8	64.1	76.0	98	50	780	4.26	2.72	5.63	7	
July	89.9	67.0	78.5	99	57	884	4.92	2.86	6.59	9	•
August	89.6	66.4	78.0	97	56	868	3.86	2.11	5.28	6	
September	84.4	61.7	73.1	96	46	693	3.30	1.57	4.71	5	5 20
October	75.5	50.8	63.2	90	30	409	2.89	.67	4.66	4	ng)
November	65.1	41.0	53.1	82	19	128	3.46	2.07	4.70	6	
December	57.0	35.6	46.3	76	11	71	4.78	2.50	6.65	7	. (
Year	74.1	50.4	62.3	100	6	5,197	52.38	45.06	59.44	81	.1

<sup>1</sup>Recorded in the period 1951-75 at Newman, Ga.

 $<sup>^2</sup>$ A growing degree day is a unit of heat available for plant growth. It can be calculated by adding the maximum and minimum daily temperatures, dividing the sum by 2, and subtracting the temperature below which growth is minimal for the principal crops in the area (50 F).

wick. The subsoil is red and extends to a depth of 36 inches. It is clay in the upper part and clay loam in the lower part. Below this, to a depth of 52 inches or more, is weathered mica schist.

This soil is low in both natural fertility and organicmatter content. It is strongly acid or very strongly acid throughout, except where the surface layer has been limed. Permeability is moderate, and available water capacity is medium. Tilth is poor because of erosion. Infiltration is slow, and surface runoff is rapid. The root zone is deep and easily penetrated by plant roots.

Included with this soil in mapping are a few small areas of severely eroded soils; several areas of Madison gravelly sandy loam; and a few small areas of Cecil, Louisa, and Pacolet soils. These areas make up 10 to 15 percent of

this map unit.

This soil has poor potential for row crops and small grain. The potential for farming is limited by the slope, by the gullies, and by the severe hazard of erosion. This soil has fair potential for hay and pasture if management is good.

This soil has fair potential for loblolly pine and yellowpoplar. The hazard of erosion, equipment limitations, and seedling mortality are management concerns. These limitations can be overcome, to some extent, by good man-

agement.

This soil has fair potential for most urban uses. The ow rate of percolation in the subsoil is a limitation for septic tank absorption fields. This limitation can be overcome by good design and careful installation. Slope is commonly a limitation for urban and recreational uses. This limitation generally can be overcome by careful design and construction or by modifying the slope. Low strength is a limitation for most community development. Capability subclass VIe; woodland suitability group 4c.

MuC-Madison-Urban land complex, 2 to 10 percent slopes. This very gently sloping and gently sloping complex consists of Madison soils and Urban land that are so intermingled they could not be separated at the scale used for mapping. The soils are on smooth ridgetops and hillsides of the Piedmont Upland. Individual areas range from 100 to 500 acres.

Madison soils make up about 60 percent of each mapped area. In a typical profile the surface layer is brown gravelly sandy loam about 5 inches thick. The subsoil is red and extends to a depth of 38 inches. It is sandy clay loam in the upper few inches, clay in the middle part, and clay loam in the lower part. Below this, to a depth of 52 inches or more, is weathered mica schist.

This soil is low in both natural fertility and organicmatter content. It is strongly acid or very strongly acid throughout. Permeability is moderate, and available water capacity is medium. Tilth is good. The root zone is deep and easily penetrated by plant roots.

Urban land makes up about 40 percent of each mapped sa. The soils have been altered by cutting, filling, and anaping for community development. Most urban land is used for shopping centers, schools, parking lots, industrial sites, streets, commercial buildings, and residences.

Included with this unit in mapping are idle areas of Madison sandy clay loam that is eroded. Most of these areas of eroded soils are dissected by shallow gullies. Also included are small areas of intermingled Cecil and Louisa soils.

This complex has high potential for most urban uses including gardens, shrubs, shade trees, and other kinds of vegetative cover common to the survey area. The slow rate of percolation is a limitation for septic tank absorption fields, but this limitation can commonly be overcome by good design and careful installation. The common plants used for landscaping and vegetable gardens grow well on these soils. The hazard of erosion is severe, however, prior to establishment of permanent cover. Tilling across the slope and establishing cover crops during the winter help control erosion on areas used for vegetable gardens. Capability subclass Ille; woodland suitability group 3o.

MuE-Madison-Urban land complex, 10 to 25 percent slopes. This sloping and moderately steep complex consists of Madison soils and Urban land that are so intermingled they could not be separated at the scale used for mapping. It is on hillsides of the Piedmont Upland. Some areas contain rills and galled spots, shallow gullies, and an occasional deep gully. Individual areas range from 10 to 75 acres.

Madison soils make up about 75 percent of each mapped area. In a typical profile the surface layer is reddish brown gravelly sandy clay loam about 5 inches thick. The subsoil is red and extends to a depth of about 36 inches. It is clay in the upper part and clay loam in the lower part. Below this, to a depth of 52 inches or more, is weathered mica schist.

This soil is low in both natural fertility and organicmatter content. It is strongly acid or very strongly acid throughout. Permeability is moderate, and available water capacity is medium. Tilth is poor because of erosion. Infiltration is slow, and surface runoff is rapid. The root zone is deep and easily penetrated by plant roots.

Urban land makes up about 25 percent of each mapped area. The soils have been altered by cutting, filling, and shaping for residences and streets.

Included with this unit in mapping are areas of Madison sandy loam and small areas of intermingled Cecil and Louisa soils.

This complex has poor potential for most urban and recreational uses because of slope. Also, the slow rate of percolation in the subsoil is a limitation for septic tank absorption fields. In places, these limitations can be overcome, to some extent, by careful design and construction, or by modifying the slope. The hazard of erosion is severe prior to establishment of permanent cover. Tilling across the slope and establishing cover crops during the winter help control erosion on areas used for vegetable gardens. Capability subclass VIe; woodland suitability group 3r.

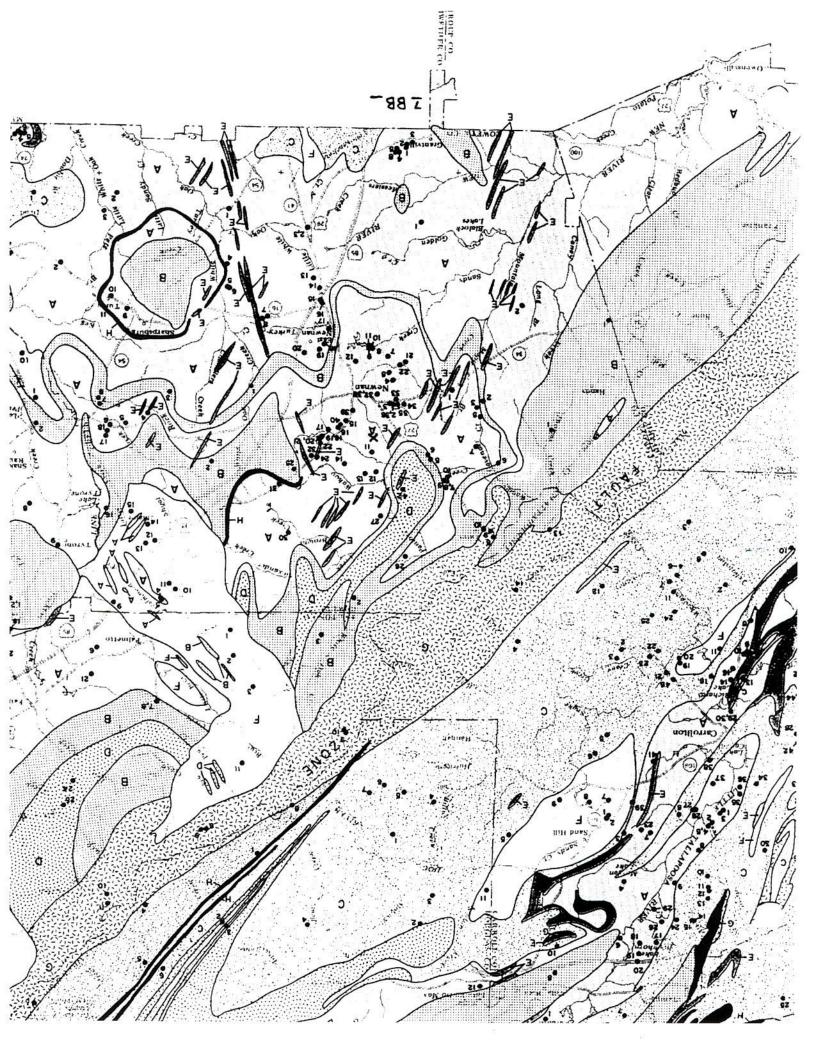


Table 9.-Record of wells in the Greater Atlanta Region--Continued

											Water bel	
Well No.	Owner	Water- bearing unit	Latitude and longitude	Yield (gal/min)	Depth (ft)	Casi depth (ft)		Date drilled	Driller	Elevation (ft)	Static head (ft)	Pumping head (ft)
Coweta	County	,	r	,	-	,	· · · ·		,			
6441	(b)(6) Personal Powers Crossroads	В	33°20'18" 84°58'47"	45	161	64	6	11/57	Virginia	840	20	30
6AA2	(b)(6) Personal Rte. 2 (for (b)(6) Personal Newman	В	33°19'44" 84°55'12"	100	90	23	6	1977	Adams- Massey	780	_	
6881	(b)(6) Personal Rte. 1, Box 1825 Coggin Rd. Newman	В	33°24'09" 84°56'28"	30	105	35	6	3/69	Virginia	860	5	20
6882	(b)(6) Personal Rte. 1, Box 2270 Welcome Rd. Newman	В	33°23'08" 84°53'33"	50	145	69	6	10/75	Virginia	840	30	145
6BB3	Western High School Welcome Community Welcome	٨	33°23'23" 84°53'20"	18	231	116	6	3/50	do.	870	40	100
6885	(b)(6) Personal Rte. 1, Box 1995 Mt. Carmel Rd. Handy	Α	33°24'38" 84°53'28"	50	120	40	6	12/77	do.	840	8	120
6886	(b)(6) Personal Murphy Rd. Newman	B,A	33°25'21" 84°54'19"	25	205	_	_	9/77	Waller	780	_	
6887	(b)(6) Personal Welcome-Sargent Rd. Newman	Α	33°24'43" 84°53'19"	30	205	_	-	1/64	Virginia	770	15	140
6BB8	Georgia Power Co. Yates Plant Newman	G	33°27'57" 84°54'24"	50+	378	34	_	5/71	Weisner	780		
6889	do-	G	33°27'43" 84°53'59"	115	307	43	_	9/65	Virginia	740		
6BB10	do.	B,G	33°27'40" 84°53'41"	100	146	42	-	5/71	do.	760		
7 <b>AA</b> 1	(b)(6) Personal Rte. 4, Box 5> Beavers Rd. Newman	Α.	33*16'52" 84*50'53"	60	490	50	6	9/67	Weisner	860		
7AA2	Moreland School Moreland	Α .	33°17'00" 84°46'06"	55	228	83	_	10/41	Virginia	940	W <del>244</del>	
7 <b>AA</b> 3	do.		33°17'03" 84°46'06"	40	458	66	6	6/67	do.	940	40	210
7444	Newnan	A	33°22'27" 84°49'48"	65	302	113	6	11/54	do.	860	30	80
7 <b>AA</b> 5	(b)(6) Personal Belt Rd. Newman	Α	33°22'12" 84°49'37"	50	136	19	6	6/58	do.	880		
7 <b>AA</b> 7	Unity Baptist Church LaGrange St. Ext. Newman		33°21'34" 84°49'34"	25	155	46	6	1963	do.	900	_	

Table 9.—Record of wells in the Greater Atlanta Region—Continued

											be	level low surface
Well No.	Owner	Water- bearing unit	Latitude and longitude	Yield (gal/min)	Depth (ft)	depth (ft)		Date drilled	Driller	Elevation (ft)	Static head (ft)	
Coweta	County											
7448	City of Newman Newman Waterworks Newman	A	33°21'16" 84°48'52"	90	400	_	_	1910	Hughes Spec.Well Orlg.Co.	810	_	_
7 <b>AA</b> 9	do.	A	33°21'16" 84°48'48"	75	500		_	1941	Hughes	810	_	_
7AA10	do.	A	33°21'09" 84°48'47"	100	350	_	_	1914	do.	850	_	
7AA11	do.	٨	33°21'08" 84°48'43"	100	350	_	_	1914	do.	880	-	_
7AA12	(b)(6) Personal 128 Woodbine Cir. Newman	A	33°21'43" 84°48'12"	50	450	98	6	6/57	Virginia	950	10	30
7AA13	Coweta County Airport Newman	Α.	33°18'46" 84°46'24"	35	205	77	6	1/66	do.	940	40	185
7AA14	Airport Spur Service I-85 & U.S. 29 Newman	A	33°19'07" 84°46'39"	75	370	94	6	7/72	do.	960	-	
7AA15	Standard Oil Station I-85 & U.S. 29 Newman	A	33°19'33" 84°46'44"	Su	248	69	6	2/72	do.	980	30	248
7AA16	Holiday Inn I-85 & U.S. 29 Newman	A	33°19'41" 84°46'48"	100+	223	68	6	12/68	Weisner	970	_	
7AA17	(b)(6) Personal Banks Haven, Hwy. 29 Newman	Α .	33°20'36" 84°47'03"	50	435	95	6	7/69	Virginia	930	22	210
7AA18	E. Newman Water Co. Newman		33°21'08" 84°46'53"	24	510	78	6	9/73	do.	960	-	-
7AA19	E. Newman School Newman		33°21'17" 84°46'40"	21	401	78	6	10/54	do.	920	35	160
	(b)(6) Personal Privacy 31 Sunrise Dr. Newman		33°21'26- 84°46'04-	75	140	30	6	6/74	do.	950	_	_
7AA21	McDowell Brothers Pinehill Estates, 2 Newman		33°21'47" 84°50'19"	60	217	65	_	1975	Adams- Massey	820	_	-
7AA22	do., 1		33°21'52" 84°50'10"	20	247	78	_	1974	do.	800		
7BB1	b)(6) Personal  Kte. 1, Box 2660  Highway 34, South Newman		33°22'42" 84°52'14"	40	120	27	6	1/78	/irginia	810	_	_
Ī	b)(6) Personal 16 Beech St. Newman		33°23'17" 84°49'45"	150	255	65	6	12/73	do.	940	_	-
	(b)(6) Personal 11 Beech St. Newnan		33°23'19" 84°49'41"	50	320	70	6	6/77	do.	890	-	-

Table 9.—Record of wells in the Greater Atlanta Region--Continued

											Water bel land s	OW
Well No.	Owner	Water- bearing unit	Latitude and longitude	Yield (gal/min)	Depth (ft)	Casi depth (ft)		Date drilled	Driller	Elevation (ft)	Static head (ft)	Pumping head (ft)
oweta	County											
7BB5	(b)(6) Personal	В	33*25'12" 84*51'21"	53	405	82	-	6/44	Virginia	820	_	_
7886	do.	В	33°25'01" 84°51'17"	69	675	_	-	1953	do.	840	-	_
7887	Arnco Mills Highway 27, North Newman	٨	33°26'02- 84°52'08-	40	360	_	_	1927	do.	760	_	
7888	do.	٨	33°26°03" 84°52'07"	50	400	_	-	1932	do.	760	-	-
7889	do.	A	33°26'02" 84°52'03"	65	586	_	_	1940	do.	755	-	~
7BB10	do.	A	33°25'53" 84°52'05"	33	300	107	6	12/54	do.	760	40	146
78811	(b)(6) Personal Box 185D, Brown Place Newman	٨	33°24'58" 84°48'54"	100	212	30	6	5/74	do.	830	-	_
7BB12	Windsor Estates (Lindsey Realty) Laurel Dr. Newman	Α	33°25'44" 84°49'07"	40	323	-	2 <u>24 (m.</u> 27)	11/77	Waller	915	-	-
78813	(b)(6) Personal Country Club Rd. Newman	A	33°25'44" 84°48'54"	75	390		_	9/77	do.	900	_	_
8814	Northside School Country Club Rd. Newman	A	33°25'23" 84°47'47"	36	288	44	=	9/51	Virginia	920	55	73
78815	BPOE Club (Elks) Atlanta Hwy. (Hwy. 29) Newnan	A	33°23'51" 84°47'49"	124	265	72	6	6/59	do.	920	30	200
78816	Newman House Motel & Resturant Highway 29 Newman	A	33°24'08" 84°47'30"	80	270	71	6	11/75	do.	900	50	210
78817	City of Newman Wahoo Creek Sewage Treatment Plant Highway 29 Newman	Α	33°24'11" 84°47'04"	63	371	28	6	12/74	do.	840	70	162
78818	(b)(6) Personal 4 Redbud Trail Newman	A	33°24'28" 84°46'51"	50	225	78	6	11/74	do.	880	_	_
78819	(b)(6) Personal  6 Redbud Trail Newman	Α.	33°24'25" 84°46'51"	30	205	64	6	3/76	do.	860	-	
7BB20	(b)(6) Personal Lakehills Subdiv. 1 Dogwood Dr. Newman	Α.	33°24'33" 84°46'42"	30	265	69	6	11/72	do.	880	_	-

Table 9.—Record of wells in the Greater Atlanta Region—Continued

											Water level below land surface	
Well No.	Owner	Water- bearing unit	Latitude and longitude	Yield (gal/min)	Depth (ft)	Cas: depth (ft)		Date drilled	Driller	Elevation (ft)	Static head (ft)	
Coweta	County	,				TF.		<u> </u>	5) 			
78821	(b)(6) Personal Lakehills Subdiv. 1 Dogwood Dr.											
	(b)(6) Personal	A	33°24'34" 84°46'40"	20	220	96	6	3/63	Virginia	875	_	
78822	(b)(6) Personal	E,A	33°24'37" 84°46'45"	20	220	53	6	4/63	do.	910	_	_
78824	Newman County Club Highway 29 Newman	E,A	33°25'09" 84°46'36"	60	500	124	6	10/48	do.	850	_	
7BB25	(b)(6) Personal										1	
	Highway 29 Newnan	В	33°25'37" 84°45'38"	33	206	101	6	12/69	do.	940	-	-
78826	(b)(6) Personal Rte. 2, Walt Carmichael Rd. Newman	A	33°28'38" 84°50'23"	32	304	6	6	10/65	do.	770	_	
78827	(b)(6) Personal Box 44, Roscoe Rd. Sargent	Α	33°27'16" 84°49'19"	37	192	44	6	5/58	do.	900	57	109
78830	(b)(6) Personal Rte. 2, Happy Valley Rd. Newnan (at residence		33°27'52"								,	***
78831	(b)(6) Personal	A	84°45'24"	51	200	56	6	6/58	do •	900		
, 5551	Highway 29, North Madras	A	33°26'07" 84°45'02"	34	295	75	6	10/65	do.	1,000	20	205
7BB32	Heritage Hills Subdiv. Highway 29, North Newnan	A	33°25'10" 84°46'26"	50	391	78	6	11/72	do.	960	90	391
78833	(b)(6) Personal 11 Thomas Way Newnan	Α	33°23'04" 84°29'56"	50	152	97	_	1974	Adams- Massey	880	_	
78834	Dixie Hill Enterprises McDowell Brothers Wedgewood Subdiv., 2 Newman		33°23'16" 84°49'58"	50	_	_	_	1977	do.	960	_	-
7BB35	do., 1		33°23'17" 84°50'10"	150	187	31	_	1977	do.	840	_	_
7BB36	(b)(6) Personal 132 Temple Ave. Newman		33°23'17" 84°49'46"	100	230	71		1972	do.	920	_	_
7BB37	William L. Bonnell Co. Subdivision, 4 Newman		33°22'58" 84°49'08"	75	201	30	_	1958	do.	920	_	
7вв38	William L. Bonnell Co. Newman, 5		33°23'00" 84°49'07"	54	300	58.5		1958	do.	920	_	
7вв39	(b)(6) Personal		33°23'43" 84°48'02"	29	350	83.5	_	1958	do.	960		

Table 9.—Record of wells in the Greater Atlanta Region--Continued

	Owner		Latitude and longitude	Yield (gal/min)	Depth (ft)	18					Water level below land surface	
Well No.		Water- bearing unit				Casi depth (ft)		Date drilled	Driller	Elevation (ft)	Static head (ft)	Pumping head (ft)
Coweta	County				,							
78840	Layton Brozell Construction Co- Skating Rink Newman	A .	33°24'01" 84°47'35"	25	260	65	_	1926	Adams- Massey	900	_	_
78842	Hickory Hollow Subdiv. (McDowell Bros.), 2	D	33°26'14" 84°50'15"	87	330	52	-	1976	_	900	-	-
7CC2	(b)(6) Personal											
2	Starr Rd- Roscoe	В	33°30'07" 84°48'13"	35	159	57	6	10/77	Virginia	850	35	159
7Z1	City of Grantville Grantville	A	33*14*06* 84*50'12*	50	500	-	8	-	-	860		_
722	do.	Α.	33°14'02" 84°50'13"	80	600	57	8	7/56	Virginia	850	_	-
7 <b>z</b> 3	do-	A	33°13'59" 84°50'23"	50	550	_	_	_	-	880	-	-
724	do-	A	33°14'16" 84°50'00"	85	500	-	8	_	_	880	-	_
725	do•	A .	33°14'09" 84°49'55"	27	650	47	8	7/62	Virginia	880	-	
7 <b>Z</b> 8	Grantville Mills Grantville		33°14'18" 84°49'54"	27	700	_	_	1933	_	840	_	
8AA 1	(b)(6) Personal Hwy. 54 & Haynie Rd. Horeland	A	33°16'19" 84°42'49"	120	127	87	6	9/71	Weisner	880	_	
8AA2	(b)(6) Personal Elders Mill Rd. Blackjack	A	33*15'49* 84*38'09"	80	200	33	6	1978	Askew- Horris	875	_	_
8443	(b)(6) Personal Elders Hill Rd. Senoia	٨	33*15'29* 84*37'39*	42	501	22	6	2/56	Virginia	860	-	
844	(b)(6) Personal	A	33°18'17" 84°42'45"	20	105	_	6	1/75	Waller	840	-	-
8445	(b)(6) Personal Hoore Rd. Raymond	Α.	33°19'16" 84°42'48"	60	357	56	6	9/76	Virginia	845	20	350
8446	(b)(6) Personal Scoggin Rd. Raymond	A	33°19'19" 84°42'53"	50	138	_	6	_	Hale	835	-	
8447	(b)(6) Personal Rte. 3, Box 83C Raymond Highway Newman	<b>A</b>	33°20'08" 84°44'28"	48	100	53	6	1/66	Virginia	880	40	50
8448	(b)(6) Personal Rte. 3, Box 135 Highway 16 Newman		33°20°12° 84°44°17°	30	140	41	6	4/65	do-	880	27	100

Table 9.—Record of wells in the Greater Atlanta Region—Continued

	Owner	yara	Latitude and longitude								Water level below land surface	
Well No.		Water- bearing unit		Yield (gal/min)	Depth (ft)	depth (ft)	diam. (in.)		Driller	Elevation (ft)	Static head (ft)	Pumpin head (ft)
oweta	County											
8449	City of Turin Turin	A	33°19'51" 84°38'41"	20	484	80	_	3/72	Waller	920	35	-
01AA8	Town of Turin P. O. Box 35 Turin	٨	33°19'26- 84°38'00-	200	352	85	_	1976	Adams- Massey	900		_
84411	(b)(6) Personal Hope Ranch, Odum Rd. Turin	н	33°19'48" 84°37'41"	50	305	_	_	9/77	Waller	900	_	
8881	(b)(6) Personal Lower Fayetteville Rd. Newman	В	33°22'38" 84°43'50"	20	123	45	6	10/76	Weisner	845	_	
8BB2	(b)(6) Personal		33*25'51-									
8883	Posey Rd. Newman (b)(6) Personal	В	84*42'13"	60	190	87	6	5/74	Virginia	910	-	-
0203	Lower Fayetteville Rd. Newman	В	33°22'50" 84°40'15"	36	270	20	6	5/59	do.	920	25	50
8884	(b)(6) Personal Lassetter Rd. Sharpsburg	A	33°23'37° 84°39'31°	60	125	88	6	10/72	do.	885	_	_
8885	(b)(6) Personal Rte. 1, Shoal Creek Rd. Sharpsburg	A	33°24'01- 84°38'37"	40	144	_	_	11/73	Waller	840	_	
8886	(b)(6) Personal Ree. 1, Box 34 Sharpsburg (now Sarvich)		33°24'02" 84°37'57"	SO	165	58	6	6/77	Virginia	810	_	_
8887	(b)(6) Personal Highway 54 Sharpsburg	В	33°23'00" 84°37'30"	150+	370	8	6	5/78	do.	800	_	_
	(b)(6) Personal Highway 54 Sharpsburg	В	33°22'59" 84°37'31"	25	85	31	6	8/75	do.	870	_	
	(b)(6) Personal Riggins Rd. (Hidley Rd.) Palmetto	F	33°29'51" 84°40'47"	50	77	38	6	11/54	do.	1,040	_	
	(b)(6) Personal Motel on Hwy. 295 Palmetto	F	33°29'38" 84°40'30"	57	340	52	6	4/57	do.	1,040	_	
	(b)(6) Personal Palmetto-Pisher Rd. Palmetto	F	33°28'09" 84°39'54"	35	170	65	6	5/56	do.	980	-	
	Cannon Gate Golf Course Palmetto		33°28'15" 84°39'32"	33	422	53	-	9/65	Weisner	960	-	-
	(b)(6) Personal Rte. 2, Box 296 Fisher Rd. Major		33°27'35" 84°39'36"	25	245	49	_	1978	Askev- Morris	960	-	

Table 9.—Record of wells in the Greater Atlanta Region--Continued

	Owner				Depth (ft)					Elevation (ft)	Water level below land surface	
Well No.		Water- bearing unit	Latitude and longitude	Yield (gal/min)		Cast depth (ft)		Date drilled	Driller		Static head (ft)	Pumping head (ft)
Coweta	County									,		
88815	Canon Gate Community Rte. 1 Sharpsburg	F	33°27'06" 84°38'52"	80	198	60	_	10/70	Weisner	930	-	
8BB16	Staton Constr. Co. 169 N. Woods Rd. Woods Crossing Sharpsburg	A,B	33°27'02" 84°37'50"	30	285	43	_	6/78	Askew- Morris	900	_	_
8CC4	(b)(6) Personal Box P Palmetto	A,F	33*30'09" 84*40'10"	150	125	33	6	8/65	Virginia	1,020	_	-
SCC 5	(b)(6) Personal R.F.D. 2, Johnson Cir. Palmetto	A,F	33°30'12" 84°40'09"	30	226	14	6	3/73	do.	1,030		
SCC 9	(b)(6) Personal Mobile Home Ranch I-85 at Palmetto Exit	F	33°30'20" 84°38'11"	23	406	92	6	4/71	do.	900	_	
9Z 1	(b)(6) Personal Highway 85, South Haralson	F	33°11'57" 84°34'44"	32	200	78	6	6/60	do.	770	10	80
922	(b)(6) Personal Highway 85, South Haralson	F	33°12'19" 84°34'52"	36	191	106	6	2/56	do.	780		
9Z3	(b)(6) Personal Dun Rovin Acres Highway 85, South Haralson	F	33°12'27" 84°34'58"	30	180	85	6	8/77	do.	780		
924	(b)(6) Personal Esco Gas Co. Haralson	Α	33°13'33" 84°34'13"	50	208	132	6	12/55	do.	820		
925	do.	A	33°13'35" 84°34'23"	74	257	134	6	9/60	do.	820	-	-
926	(b)(6) Personal Dreweyville Rd. Haralson	A	33°13'33" 84°34'07"	48	199	135	6	4/66	do.	820	_	
	Haralson School Haralson (b)(6) Personal	A	33°13'38" 84°33'58"	38	203	109	-	====	-	830	20	75
929	Dreweyville Rd. Haralson	A	33°13'19" 84°32'05"	47	400+	-	-	1960's	_	800	_	
9210	(b)(6) Personal Privacy Haralson	F	33°11'10" 84°16'57"	50	313	187	6	5/61	Virginia	810		
9 <b>A</b> A1	Eastside Elem. School Old Highway 85 Senoia	С	33°15'58" 84°34'48"	26	326	81	1	10/54	do.	900	20	166
9AA2	East Coweta School Peeks Crossing Sharpsburg	Α .	33°18'14" 84°35'56"	48	152	-	-	12/50	do.	940		125

Table 9.- Record of wells in the Greater Atlanta Region-Continued

						Casing		0			Water level below land surface	
		Water-	Latitude	V=2010101010	l			1				Pumping
Well No.	Owner	bearing	and longitude	Yield (gal/min)	Depth (ft)	depth (ft)	diam. (in.)	Date drilled	Driller	Elevation (ft)	head (ft)	head (ft)
oveta	County							L				
9443	(b)(6) Personal											
77445	McKnight Grain Elevs.		33*17'57"									(
	Senoia	٨	84*33'49"	30	204	-	-	3/74	Virginia	840	_	
9AA4	City of Senoia		33°17'49"	1					Sou			}
	Senoia	A	84 *33 '39 *	55	500	40		2/46	Stevens	840	_	
9AA5	do.		33°17'30"					Ì			ĺ	
35.00.55	7.5A	A	84*33'22"	53	459	107	-	4/47	Virginia	820	-	-
9446	do.		33°18'06"						Adams-			
	5050	. А	84°32'57"	50	385	-		10/58	Massey	850	_	
9AA7	do.		33°18'22"		M							
	0.000000000		84*33'14"	50	500	E 2000 DV	S. come	0.000		850	E ranco	(

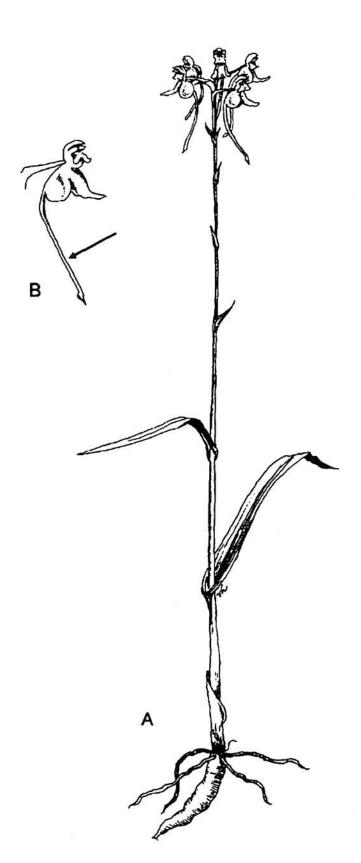
Table 9.—Record of wells in the Greater Atlanta Region—Continued

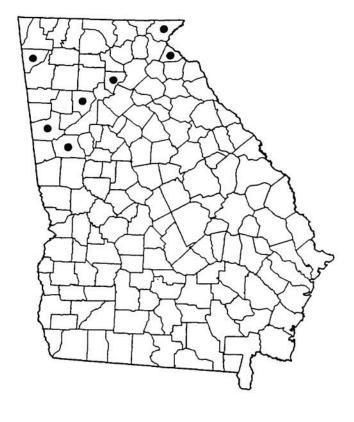
											Water level below land surface	
Well No.	Owner	Water- bearing unit	Latitude and longitude	Yield (gal/min)	Depth (ft)	depth (ft)	diam. (in.)	Date drilled	Driller	Elevation (ft)	Static head (ft)	Pumping head (ft)
Dawson	County											
11KK2	Cousins Proper- ties, Inc. Big Canoe Resort Marblehill	_	34°28'28" 84°17'39"	22	600	92	6	6/72	Virginia	1,820	158	250
11KK3	do.	-	34°28'18" 84°17'54"	103	335	52	6	7/72	do.	1,700	93	127
11KK9	do.		34°28'35" 84°18'39"	23	500	25	6	5/73	do.	1,870	10	315
116811	do.	-	34°28'11" 84°17'09"	28	500	71	6	7/73	do.	1,660	80	235
11KK12	do.	-	34°28'20" 84°17'15"	60	500	72	6	7/73	do.	1,640	60	255
1 1KK 13	do.		34°28'12" 84°17'40"	40	500	38	6	7/73	do.	1,720	50	265
1 1KK 14	do.		34°28'04" 84°17'07"	43	500	64	6	8/73	do.	1,650	-	150
11KK16	do.	-	34°28'22" 84°19'09"	53	500	81	6	8/73	do.	1,840	135	180
1KK24	do.		34 *28 *02 * 84 *15 *23 *	43	166	58	6	12/72	do.	1,840	31	116

Appendix H

Monkeyface Orchid, White Fringeless Orchid

Orchid Family, ORCHIDACEAE





#### **LEGAL STATUS:**

State: THREATENED Federal: CANDIDATE

#### SYNONYMY:

Habenaria blephariglottis (Willdenow) Hooker var. integrilabia Correll Habenaria correllii Cronquist

RANGE: Cumberland Plateau of northwestern Georgia and adjacent Alabama, north through Tennessee to southern Kentucky; Gulf Coastal Plain of central Mississippi and Alabama; also extremely scarce to extirpated in the Blue Ridge Mountains and foothills of the Piedmont Plateau in Georgia and the Carolinas, north to southwestern Virginia. Recorded from seven counties in Georgia (see map).

ILLUSTRATION: (A) plant habit, with both fibrous and tuberous roots and few-flowered inflorescence, 0.6×; (B) flower, side view, 1.2×; note long spur. Source: original drawing by Vicky Holifield.

**DESCRIPTION:** Perennial herb to 6 dm tall, from a cluster of fibrous roots and 1-few, tuberous,

fleshy roots (see illustration). The stem leaves number two or three, and are lanceolate, slightly folded along a strong central vein, up to 20 cm long and 3 cm wide, becoming bract-like near the top of the stem. Juvenile plants may have no aboveground stems and appear as single, strapshaped leaves. The inflorescence is a loosely flowered, terminal cluster (raceme) with 6-15 pure white flowers. The flowers are white and bilaterally symmetrical, modified in a complex way for insect pollination. For our purposes, a lower lip (landing platform from an insect's vantage point) and a prominent spur (source of nectar for the insect) need to be distinguished. The lip is 13 mm long and 3-5 mm wide, with an entire to slightly and irregularly fringed margin. The downward-pointing spur is 4-5 cm long (see illustration). The fruit is an ellipsoid capsule, 15 mm long, 3 mm wide, with numerous, dustlike seeds. Flowering period: mid-July to late August; fruiting period: September to October. Best search time: during flowering, since a few other orchids in the same genus have similar leaves, making the flower essential for identification.

HABITAT: Found in red maple-blackgum swamps; along sandy, damp stream margins; or on seepy, rocky, thinly vegetated slopes. Common associates include green woodland orchid (*Platanthera clavellata*), white violet (*Viola primulifolia*), cowbane (*Oxypolis rigidior*), and grass-of-Parnassus (*Parnassia asarifolia*). In one bouldery gorge site, poison sumac (*Toxicodendron vernix*) grows overhead above seepy mounds of sphagnum moss and scattered grass-pinks (*Calopogon tuberosus*). The typical habitat is a seasonally wet, perched, sandy, springhead swamp dominated by red maple (*Acer rubrum*) and blackgum or swamp tupelo (*Nyssa biflora*).

SPECIAL IDENTIFICATION FEATURES: The only definitive way to identify the white fringeless orchid is to observe the flower. The long spur, the entire (or nearly so) margin of the lip, and the pure white color distinguish this orchid from any other native species. Typically, this orchid resides in deep shade and vegetative specimens with only strap-shaped basal leaves far outnumber flowering individuals.

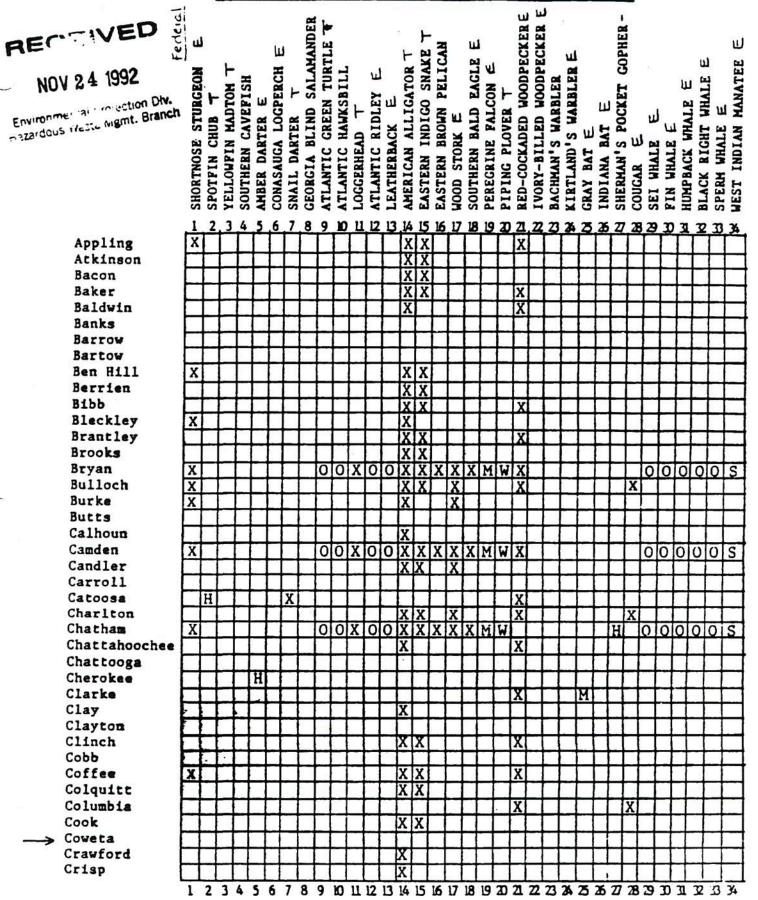
MANAGEMENT RECOMMENDATIONS: Avoid drainage of site. Hand thinning of shading trees in its vicinity, if done carefully, may be beneficial to this species. Of horticultural interest: protect from removal by irresponsible persons.

**REMARKS**: The earliest collection of this species came from somewhere in Georgia, in 1840. The earliest mention in botanical literature dates to 1910. In 1941 Donovan S. Correll (1908-1983) formally described it as Habenaria blephariglottis var. integrilabia, distinguished from typical H. blephariglottis by its entire lip. Some authors, such as Correll, employ a broad concept of Habenaria, one that includes a group of species others recognize as a distinct genus, Platanthera. In 1975 Carlyle A. Luer elevated it to the rank of species, calling it Platanthera integrilabia. For those who prefer to consider this plant a Habenaria, using the combination H. integrilabia could lead to confusion with another species, for which the name Habenaria integrilabris was published in 1909. The International Code of Botanical Nomenclature, the "law" governing the scientific names given to plants, forbids such confusing names. This is the rationale for the recently published name, Habenaria correllii. Platanthera integrilabia is rare throughout its range. It has sustained significant habitat loss due to draining and clearing of its habitat for conversion to agricultural land, and is considered vulnerable to commercial or other over-collecting.

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#### GEORGIA'S PROTECTED WILDLIFE COUNTY CROSS-REFERENCE



X=General occurrence, see appendix; 0=Occurs in offshore waters only; W=Winter occurrence only; S=Summer occurrence only; M=Occurs irregularly as a migrant; R=Release or potential release site; H=Historical occurrence